

**Telecommunications Relay Service  
Application for Renewal of current Certification  
State of Utah**

**Submitted to:**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW, Room TW-A325  
Washington, DC 20554

**Submitted by:**

Public Service Commission of Utah  
Heber M. Wells State Office Bldg.  
160 East 300 South, 4th Floor  
Salt Lake City, UT 84111

**Provider of Service:**

**Hamilton Telephone Company**  
**d/b/a Hamilton Telecommunications**  
1001 Twelfth Street  
Aurora, NE 68818  
402-694-3656 TTY/Voice  
800-618-4781 Toll Free  
402-694-5037 FAX



## State of Utah

GARY R. HERBERT  
Governor

GREG BELL  
*Lieutenant Governor*

## Public Service Commission

TED BOYER  
*Chairman*

RIC CAMPBELL  
*Commissioner*

RON ALLEN  
*Commissioner*

September 25, 2012

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, Room TW-A325  
Washington, DC 20554

Dear Ms. Dortch,

In reference to the Public Notice released on July 23, 2012, Relay Utah, a division of the Utah Public Service Commission, on behalf of the State of Utah, respectfully submits the attached application for re-certification. The State of Utah is meeting all FCC minimum requirements as evidenced by the enclosed required information.

Please advise if other information or clarification is needed. We look forward to an expeditious review.

Sincerely,

Gary Widerburg  
Contract Administrator for Relay Utah  
Heber M. Wells Bldg, 4th Floor  
160 East 300 South  
Salt Lake City, Utah 84111  
Phone: (801) 530-6713  
Email: [gwiderburg@utah.gov](mailto:gwiderburg@utah.gov)



# PUBLIC NOTICE

Federal Communications Commission  
445 12th St., S.W.  
Washington, D.C. 20554

News Media Information 202 / 418-0500  
Internet: <http://www.fcc.gov>  
TTY: 1-888-835-5322

DA 12-1187  
July 25, 2012

## CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU REMINDS STATE TELECOMMUNICATIONS RELAY SERVICE PROGRAMS TO SEEK RECERTIFICATION

### CG Docket No. 03-123

This Public Notice alerts states and territories that the certifications that they now hold for the provision of telecommunications relay services (TRS) will expire on July 26, 2013.<sup>1</sup> Under the Federal Communications Commission's (Commission's) TRS regulations, each state or territory may file an application for "renewal" of its certification one year prior to expiration, *i.e.*, beginning on July 26, 2012.<sup>2</sup> Although there is no prescribed deadline for filing, we request that renewal applications be filed no later than October 1, 2012, to give the Commission sufficient time to review and rule on the applications prior to the expiration of the existing certifications.

Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA),<sup>3</sup> codified at Section 225 of the Communications Act of 1934, as amended (Act).<sup>4</sup> TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with other individuals.<sup>5</sup> Under the Act, the Commission must ensure the provision of TRS that is functionally equivalent to voice telephone service.<sup>6</sup> The Commission's TRS regulations set forth mandatory minimum standards that TRS providers must follow to meet this functional equivalency mandate.<sup>7</sup>

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<sup>1</sup> As amended by Section 103(a) of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA), TRS is defined as "telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio." Pub. L. No. 111-260, 124 Stat. 2751, *technical amendments*, Pub. L. No. 111-265, 124 Stat. 2795 (Oct. 8, 2010) § 103(a), codified at 47 U.S.C. § 225(a)(3). *See also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, 12479, ¶ 3 n.18 (2004) (describing how a traditional TRS call works).

<sup>2</sup> 47 C.F.R. § 64.606(c)(1). Since 1993, the Commission has granted states certification to operate their own TRS programs in five year increments. The Consumer and Governmental Affairs Bureau, under delegated authority, issued its last round of certification grants in July 2008.

<sup>3</sup> Pub. L. No. 101-336, 104 Stat. 327 (July 26, 1990).

<sup>4</sup> 47 U.S.C. § 225.

<sup>5</sup> 47 U.S.C. § 225(a)(3).

<sup>6</sup> 47 U.S.C. § 225(a)(3).

<sup>7</sup> *See* 47 C.F.R. § 64.604.

Under Section 225, states wishing to establish their own TRS programs for the provision of intrastate and interstate TRS over the public switched telephone network may receive Commission certification to do so.<sup>8</sup> All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and Speech-to-Speech relay (STS) service.<sup>9</sup> States may also offer captioned telephone relay service (CTS). States seeking renewal of their certification must include information about each of these services in their applications so that the Commission can ensure that the provision of these services is consistent with its rules and that the state is exercising responsibility for oversight of these services.<sup>10</sup>

Specifically, in order to obtain certification, a state must submit documentation to the Commission that describes its relay program and include its procedures and remedies for enforcing any requirements that the program may impose.<sup>11</sup> In addition, a state must establish that its program makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints.<sup>12</sup> The Commission's TRS regulations explain that documentation should be submitted in narrative form, and that the Commission shall give the public notice of such applications.<sup>13</sup>

The state certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. Applications for certification will be reviewed to determine whether each state TRS program has sufficiently documented that it meets or exceeds all of the applicable operational, technical and functional mandatory minimum standards set forth in section 64.604 of the Commission's rules.<sup>14</sup> If the program exceeds the mandatory minimum standards, the state must establish that the program does not conflict with federal law.<sup>15</sup> In addition, applications will be reviewed to ensure that each state TRS program makes available adequate procedures and remedies for enforcing the requirements of each state's program.<sup>16</sup>

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<sup>8</sup> Although state TRS programs may offer interstate as well as intrastate TRS, only the costs associated with the provision of intrastate TRS are recovered from the state. See 47 U.S.C. §225(d)(3). States with certified TRS programs may allow TRS providers operating under their programs to recover such costs by a method consistent with the jurisdictional separation of costs requirements of Section 225. See *id.* Costs associated with the provision of interstate TRS are recovered from subscribers of interstate and Voice over Internet Protocol (VoIP) service, and such providers are reimbursed through the TRS Interstate Fund. *Id.* In October 2011, the Commission adopted rules to implement Section 103(b) of the CVAA, requiring interconnected and non-interconnected VoIP service providers to participate in and contribute to the TRS Fund. See CVAA § 715; 47 U.S.C. § 616; *Contributions to the Telecommunications Relay Service Fund*, CG Docket No. 11-47, Report and Order, 26 FCC Rcd 14532 (2011).

<sup>9</sup> See 47 C.F.R. § 64.603.

<sup>10</sup> Since 2003, CTS has been a non-mandatory type of TRS that is eligible for compensation from the states for intrastate calls and from the Interstate TRS Fund for interstate or IP-based CTS calls. *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, Declaratory Ruling, 18 FCC Rcd 16121 (2003). If a state does not offer CTS, it need not submit documentation in its certification application pertaining to this service.

<sup>11</sup> 47 U.S.C. § 225(f); 47 C.F.R. § 64.606(a).

<sup>12</sup> 47 C.F.R. § 64.606(b)(1)(ii).

<sup>13</sup> 47 C.F.R. § 64.606(a).

<sup>14</sup> 47 U.S.C. § 225(f)(2)(A). See 47 C.F.R. § 64.604.

<sup>15</sup> See 47 C.F.R. § 64.606(b)(1)(iii).

<sup>16</sup> 47 U.S.C. § 225(f)(2)(B).

**PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123 and be captioned “TRS State Certification Application.”**

**Electronic Filers:** Filings may be filed electronically using the Internet by accessing the Commission’s electronic comment filing system (ECFS): <http://apps.fcc.gov/ecfs/>. Follow the instructions provided on the website for submitting electronic filings. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal service mailing address, and **CG Docket No. 03-123**.

**Paper Filers:** Parties who choose to submit by paper must submit an original and one copy of each filing. To expedite the processing of the applications, parties submitting by paper are encouraged to submit an additional copy to Attn: Dana Wilson, Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12<sup>th</sup> Street, SW, Room 3-C418, Washington, DC 20554 or by email at [Dana.Wilson@fcc.gov](mailto:Dana.Wilson@fcc.gov). Parties should also submit electronic disk copies of their certification filing. The electronic media should be submitted in “read-only” mode and must be clearly labeled with the state’s name, the filing date and captioned “TRS Certification Application.”

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission’s Secretary, Office of the Secretary, Federal Communications Commission. All hand-delivered or messenger-delivered paper filing for the Commission’s Secretary must be delivered to FCC Headquarters at 445 12<sup>th</sup> Street, SW, Room TW-A325, Washington, DC 20554. The filings hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of *before* entering the building.

Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743. U.S. Postal Service first-class mail, Express Mail, and Priority Mail must be addressed to 445 12<sup>th</sup> Street, SW, Washington, DC 20554.

**SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE**

<b>DATE</b>	<b>ITEM</b>	<b>FCC ACTION</b>
Beginning July 2012	Commission issues Public Notices seeking comment on state TRS applications that have been filed.	Comments are due within 30 days of release of the Public Notices; reply comments are due within 15 days thereafter.
July 2012 – May 2013	Commission reviews applications for TRS recertification for compliance with 47 C.F.R. §§ 64.604 and 64.606.	If necessary, Commission sends deficiency letters requesting additional information from states to confirm compliance with the TRS mandatory minimum standards and other certification requirements.
May - July 2013		Commission issues Public Notices and Letter Orders of certification renewals.

**ADDITIONAL INFORMATION**

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12<sup>th</sup> Street, SW, Room CY-A257, Washington, DC 20554. These documents also may be purchased from the Commission’s duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12<sup>th</sup> Street, SW, Room CY-B402, Washington, DC 20554. Customers may contact BCPI at their web site: [www.bcpweb.com](http://www.bcpweb.com) or by calling (202) 488-5300. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at <http://apps.fcc.gov/ecfs/> (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This *Public Notice* also can be downloaded in Word or Portable Document Format (PDF) at: <http://transition.fcc.gov/cgb/dro/trs.html>.

**For further information regarding this *Public Notice*, please contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disability Rights Office, at (202) 418-2247 (voice), (202) 418-2297 (TTY), or e-mail at [Dana.Wilson@fcc.gov](mailto:Dana.Wilson@fcc.gov).**



## **Introduction**

This application is submitted by the Utah Public Service Commission on behalf of the State of Utah to certify Relay Utah's Telecommunications Relay Service pursuant to the rules and procedures set forth by the Federal Communications Commission. The State of Utah has been certified for the certification time period beginning July 26, 2008 and ending July 25, 2013.

Official notices, documentation and correspondence related to this application should be directed to:

Gary Widerburg, Contract Administrator  
Relay Utah  
Commission Secretary  
Heber M. Wells Bldg, 4th Floor  
160 "East 300 South  
Salt Lake City, Utah 84111  
Phone: (801) 530-6713  
Email: [gwiderburg@utah.gov](mailto:gwiderburg@utah.gov)

Operational questions about the center may also be directed to the following:

Dixie Ziegler  
Vice President of Relay  
Hamilton Relay, Inc.  
1001 12th Street  
Aurora, NE 68818  
Voice/TTY: 402-694-3656  
Toll Free: 800-618-4781  
Fax: 402-694-5037  
E-mail: [dixie.ziegler@hamiltonrelay.com](mailto:dixie.ziegler@hamiltonrelay.com)  
Website: [www.hamiltonrelay.com](http://www.hamiltonrelay.com)

## **Request for Renewal of Current State Certification**

Wherefore, the Utah Public Service Commission requests that the Federal Communications Commission certify the State of Utah Telecommunications Relay Service provided through Hamilton Telephone Company in Aurora, Nebraska.

The Utah Public Service Commission  
on behalf of the State of Utah

By: \_\_\_\_\_

Gary Widerburg, Contract Administrator  
Relay Utah  
Commission Secretary  
Heber M. Wells Bldg, 4th Floor  
160 "East 300 South  
Salt Lake City, Utah 84111  
Phone: (801) 530-6713  
Email: [gwiderburg@utah.gov](mailto:gwiderburg@utah.gov)

## **TRS Contract Status**

Hamilton Telephone Company d/b/a Hamilton Telecommunications is operating Relay Utah under contract with the Utah Public Service Commission. The term of the contract is effective January 28, 2010 through January 28, 2013, with two 1 year renewals.

Hamilton provides TRS service for the State of Utah from the Georgia Center located at 2231-T Dawson Road, Albany, GA 31707.

Relay Utah provides users with a complete service package including all features and services as detailed in this filing. Training for Communication Assistants is continual. Relay Utah has also developed an outreach program for the State of Utah with a team of staff people devoted to this function.

## **§ 64.604 Mandatory minimum standards.**

*The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.*

*(a) Operational standards –*

*(1) Communications assistant (CA).*

*(i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.*

*(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.*

*(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.*

Recognizing that high quality Relay Communications Assistants ("CAs") are critical to providing consumer satisfaction, Relay Utah thoroughly trains its Relay CAs to meet the specialized communications needs of individuals who are deaf, hard of hearing or have difficulty speaking. All Relay Utah CAs possess clear and articulate voice communications. They have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with the various cultures of relay users, languages and etiquette. All Relay Utah CAs provide a typing speed of a minimum of 60 words per minute, and Hamilton confirms this by giving oral-to-type tests of CA speed.

CAs are trained to relay calls in a manner that meets and often exceeds FCC standards. The following describes how Relay Utah's service provider trains its CAs to meet operational proficiency standards stated above. Before hiring, exams are given to each applicant in the following areas to ensure that the candidate has the needed skills to become a fully trained Relay CA:

- (1) Spelling skills (must achieve at least 90% correct)
- (2) Reading skills (must be able to read clearly and distinctly)
- (3) Typing proficiency

Additional details about these requirements are as follows:

### **Spelling Skills**

The minimum spelling skill required of Relay Utah Communication Assistants is the ability to quickly and easily spell words that are equivalent to that of a beginning college

level conversation. CAs must pass a spelling exam to be eligible to work as a Relay Utah CA and score in at least the 90th percentile. The spelling skills exam is based on a 12th grade spelling level. Relay Utah performs similar testing for Spanish CAs.

### **English Reading, Speaking, and Writing Skills**

Communication Assistants must meet all grammar proficiency requirements including reading, speaking, and writing English Communication at a minimum of a 12th grade level prior to employment. Relay Utah also tests for diction, clear and articulate voice communications and a neutral accent by requiring each prospective CA to complete a reading exam.

### **Typing Proficiency**

Communication Assistants must type 60 words per minute (wpm) for five minutes. Relay Utah exceeds this service level by requiring CAs to maintain a 95% accuracy level while typing 60 wpm. Relay Utah's provider has an average typing speed of 68.9 wpm with 98% accuracy.

Newly hired CA are required to meet Relay Utah minimum typing proficiency standard on an oral-to-text exam within a three week period before they may take calls. Relay Utah also tests its CAs every four months in a manner simulating actual working conditions to document current proficiency levels. If a CA is unable to meet the 60 wpm requirement, the CA is removed from live relay calls until further training and compliance can be accomplished.

Relay Utah also uses a computer based typing program for continuing enhancement of keyboarding, spelling and grammar skills. This program is available to all CAs.

Relay Utah performs test calls to document current proficiency levels of the CAs and to make sure each is making progress over the term of their employment. Conducting typing tests during live relay calls also ensures that Relay CAs are meeting all typing requirements during actual calls.

### **Training**

All Relay Utah staff, including management, receive 20 hours of initial training devoted solely to disability issues including ASL "gloss", ASL style and grammar, tone of voice, deaf, hard of hearing and hearing cultures, etiquette, pertinent information about the needs of people who are deaf or hard-of-hearing, the role of the CA (including training to relay the contents of a call as accurately as possible without intervening in communication) and operation of relay telecommunications equipment including answering machines and computerized services. This training is done through videos, seminars with staff who are familiar with the relay communities, observation (both simulated and on live calls), and a variety of role-play scenarios. CAs are well trained to effectively meet the specialized needs of relay users.

In addition to basic training during new hire training, Relay Utah provides an additional 12 hours of specialized/cultural training annually.

Spanish language relay CAs must complete the same training as all traditional Relay CAs and must additionally pass tests confirming proficiency in the Spanish language.

### **Proficiency Examinations**

Relay Utah CAs begin relaying calls at the end of the three-week training period, assuming all examinations have been passed and proficiency skills have been shown. In addition to these exams and skill tests, CAs must successfully complete several relay call scenarios to demonstrate proficiency in simulated scenarios. Hamilton can then determine that a CA is meeting and exceeding all minimum FCC proficiency requirements. Tests are kept confidential and portions of the tests are changed routinely. CAs are tested on a variety of topics monthly to ensure that they continue to meet all requirements.

### **CA Performance Monitoring to Ensure Each CA Continues to Meet All Requirements**

Through its provider's advanced relay platform, Relay Utah has established a unique remote call monitoring system. Relay Utah uses this call monitoring system to continually monitor call performance. Such items as proficiency and professionalism, procedures, language, voice quality, decorum, and professional knowledge and skills are evaluated daily.

Relay Utah constantly monitors its CAs for quality control. Two formal call evaluations are completed each month, and informal "spot checking" is conducted every day to ensure that CAs are performing properly on calls.

Formal call monitoring includes observation of the call from start to finish. The CA either earns a passing or failing score in the applicable category. These monitorings are conducted by a Relay Supervisor and the Monitoring Supervisor. Two formal evaluations are required of each CA per month.

Through the call monitoring process, any CA not in compliance with quality standards is taken off duty for further training and re-testing. These CAs are put on probation and monitored frequently to ensure continued improvement.

*(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.*

Relay Utah does not change Communication Assistants during a call. Even at the end of shifts, over lunch hours, and other breaks, Relay Utah CAs stay with a call until it is completed. Our experience has been that this provides much greater continuity for the user.

Relay Utah exceeds the FCC standard for substitution of CAs for TTY-based TRS and STS TRS.

Relay Utah only substitutes a CA if the following should occur:

- **A caller requests a change in gender of the CA**  
Relay Utah CAs, when requested, will switch a call to another CA who is of the same gender as the caller and retain that CA for the user throughout the relay call.
- **Verbal abuse or obscenity is directed to the CA**  
If a relay user becomes abusive towards a CA (calling names, etc.) or does not give a number to dial, Relay Utah's procedure is to send a hot key requesting the number to call three times, waiting approximately 20 to 30 seconds between each time the hot key is sent. If the CA is still being harassed or is not given a number to dial, a supervisor is called. The supervisor will try to process the call. If abuse continues or there is no response, a disconnect slip will be completed.
- **The call requires a specialist (Spanish language, speech to speech, etc.)**
- **A perceived conflict of interest exists or,**
- **A major emergency exists**

A change never takes place until either the calling or called party has completed their part of the conversation.

If a call does need to be transferred, another CA replaces the CA relaying the call at the same workstation so that the relay user's call is not interrupted (except to identify the new CA to both parties). A supervisor monitors the change and must approve the change based on the criteria listed above.

*(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.*

Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call. Utah's provider has the technical capability to automatically route calls to CAs of the preferred gender, if available, based on customer profile selection.

*(vii) TRS shall transmit conversations between TTY and voice callers in real time.*

Relay Utah transmits conversations between Relay and voice callers in real time.

*(2) Confidentiality and conversation content.*

*(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local*

*law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.*

*(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.*

Relay Utah CAs are instructed not to disclose the content of any relayed conversation regardless of content, and to refrain from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. CAs are instructed not to intentionally alter a relayed conversation. To the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, CAs are instructed to relay all conversation verbatim unless the relay user specifically requests summarization or if the user requests interpretation of a call. Relay Utah employs various methods to ensure that all relay users' confidentiality is maintained, including the restriction of access to its call centers and the partitioning of CAs into individual cubicles to ensure relay call privacy. All Relay Utah employees must sign a confidentiality agreement committing to keep all information confidential.

All information about users is treated confidentially and will not be sold, distributed, shared, or divulged by Hamilton or any of its employees, unless divulging such information is compelled by lawful order.

### *(3) Types of calls.*

*(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.*

*(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.*

*(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.*

Relay Utah does not and will not place any restrictions on the length or number of single or sequential calls placed by customers through the relay center. Relay Utah will continue to manage its traffic loads in a manner that will not require that customers be asked to call back later.

Relay Utah is capable of processing non-coin-sent paid calls, sent-paid calls, collect calls, person-to-person calls, international calls, hotel calls and calls charged to a third party. Relay Utah is also able to process credit cards, any Virgin Islands local exchange calling cards and all non-proprietary interexchange company calling cards that are accessed by dialing an 800 number. This includes all major interexchange company calling cards. Relay users simply inform Relay Utah's CAs when they want to use an alternate form of billing. The CA selects the correct billing method from an on-screen menu and the call is then placed. The customer's carrier of choice actually bills the call (based on conversation time) as described previously, for intralata, interlata and international calls. Relay Utah bills no calls and receives no revenue.

### **Coin Sent Paid**

Relay Utah is capable of handling any call normally provided by common carriers with the exception of coin sent paid calls. The technology and networks between the common carrier network, payphones and relay do not allow for signaling to be passed so that a Communication Assistant can determine when coins have been dropped into the payphone. Furthermore, the FCC ordered that coin sent paid calls are not feasible.

Relay Utah does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin-sent paid order.

Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect or third party call. The customer's carrier of choice will then rate and bills any long distance payphone calls. Once billing has been established the call will be processed as a regular relay call. In this manner, all relay users have access to anyone from a payphone.

### **Cellular/Wireless/PCS Phone Access**

Relay Utah is capable of processing relay calls that involve pagers, cellular and personal communications services. These services are all part of the Public Switched Network and they are handled just like any other relay call.

Workstations have built-in DTMF generating capabilities to perform dialing or access functions for relay users. The DTMF software sends tones that activate automated voice systems and pagers. With DTMF capability, Relay Utah can navigate voice menus, answering machines, or any other automated system that either record or passes on voice, text, or electronic message to the other party even when using a wireless device.

The relay switch identifies wireless calls with a false ANI associated with it and Relay Utah processes the call as “no bill” preventing the relay user from having to use alternate form of billing. One exception is when false ANI information is forwarded. Although infrequent, this situation would require the CA to ask for an alternate form of billing.

### **Directory Assistance**

Relay Utah gives all relay users access to local, intrastate and interstate directory assistance services via the relay and processes directory assistance requests in the same manner as any other relay requests.

Upon receiving the area code from the relay user, the CA dials the correct area code plus 555-1212. When reaching the directory assistance operator, the CA identifies the relay and asks for the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

### **End User Billing for Directory Assistance**

The relay user can pick which carrier they want to use for directory assistance. The relay user’s carrier of choice bills for interlata and intralata directory assistance calls at their tariffed rate. With intralata presubscription, all billing is performed by the customer’s carrier. All directory assistance calls are sent to the customer's carrier of choice for processing and billing. Relay Utah does not set any rates for long distance or operator assisted calls since the customer’s carrier of choice bills these calls. All directory assistance calls are billed via the customer's long distance carrier.

### **Network Access**

Relay Utah’s system provides for and serves all of the following types of calls.

- (1) Local calls originating and terminating within the Virgin Islands, including EAS and optional calling plan calls
- (2) Intralata, interstate calls which are considered local calls – Billed to the TRS Interstate Fund
- (3) Intralata calls originating and terminating within Utah
- (4) Interstate calls that originate within Utah and terminate outside of Utah - Billed to the TRS Interstate Fund
- (5) Interstate calls that originate outside of Utah and terminate in Utah - Billed to the TRS Interstate Fund
- (6) Interstate calls that originate outside of Utah and terminate outside of Utah - Billed to the TRS Interstate Fund

Relay Utah 800 numbers, including 711, will be able to place the call types listed above. Relay Utah's service is designed so that all calls made through its relay centers are billed from the originating telephone number to the terminating telephone number as if the call were made directly with no relay intervention. The relay platform stores the necessary information about extended area service and optional calling plan arrangements in Utah so that calls made within an EAS area or optional calling area are not billed to the customer. ANI information appears at the workstation automatically and the terminating number is keyed in by the Communication Assistant so that a billing record can be created. For calls originating in areas where ANI information is not forwarded, Relay Utah's Communication Assistants will key in originating number information.

### **Local and Intrastate Relay Calling**

Relay Utah provides local and intrastate calling to the users of Relay Utah and has obtained the necessary information (NPA/NXX) to build a database to identify the difference between local and intrastate calls (this includes expanded local information).

Relay Utah's provider has contacted the LECs within Utah to collect all EAS and local optional calling plan information. Once this information was gathered, Relay Utah's provider updated its database within its switching platform and its toll processing system to identify certain NPA-NXXs as toll-free calling areas. Relay users with access to optional calling plans will not be billed any more for calls to the specific optional calling area than if they would have called directly through their local network.

The calling party's ANI is compared to the called number. Relay Utah's relay database determines if it is a local or intrastate toll call and gives the Communication Assistant notification if billing information is required. If it is a local call, no billing arrangements are necessary and there are no charges. If it is a toll call, Relay Utah sends the call to the customer's carrier of choice for billing purposes.

The entire call process and CA procedures are designed to make the relay center seem invisible. To the relay user, a call looks like it was placed from his or her primary location to the call destination. Relay users do not see or get billed for the "links" going to and from the relay center. Relay users receive no billing for local calls. Intrastate/intralata calls are billed by the customer's carrier, as described further in this Section.

### **Access to Regionally Directed Toll-Free Numbers**

Relay Utah allows access to regionally directed toll-free numbers. Because Relay Utah passes true Caller ID information, the caller's ANI reflects a Virgin Islands number which results in the call being routed to the correct state or regional location.

### **Access to Restricted Toll Free Numbers**

The service provided by Relay Utah allows access to restricted 800 numbers and other special prefixes. Relay Utah is providing this service today through an incumbent LEC via re-originating dial tone. Relay Utah makes sure that all of the relay users in Utah have access to all 800 numbers and other special prefixes.

### **Access to Businesses with Special Prefixes**

Relay Utah understands that some local telephone companies have abbreviated numbers available for services calls. Relay Utah will continue to work with LECs to ensure proper routing and will allow Relay Utah users to access businesses with special prefixes.

### **Extended Area Service**

Relay Utah's provider has obtained the needed local calling area information from Utah LECs and routinely updates this information. This includes any EAS and/or local optional calling plan data. This data is collected through letters, telephone calls, and meetings with the LECs in the Virgin Islands.

Relay Utah's provider also makes use of the Terminating Point Master (TPM) from Telcordia to verify Latas, as well as vertical and horizontal positions, which are necessary elements in determining mileage and jurisdictions. Relay Utah's provider uses the TPM to define call jurisdictions by linking the calling and called numbers to geographic data tables that contain NPA-NXX information, identifying intralata, interlata, or local/EAS. The jurisdiction is also defined at the workstation during the actual call. Relay Utah's provider updates the TPM file monthly.

### **Interstate and International Calls**

Relay Utah provides interstate and international calling to Relay Utah users. Interlata (including interstate and international) and intralata long distance toll charges are recorded and billed by the relay users' carrier of choice in the same manner as the carrier bills that customer for direct interlata and intralata long distance calls. On each interlata and intralata call, Relay Utah forwards the appropriate information digits, calling number and called number as part of the call information so that the long distance company can bill the customer directly or through their normal billing mechanisms.

When a call has been defined as a long distance call, Relay Utah sends this call to its relay switching tandem. The customer's selected carrier code is sent with each call so that the tandem sends the call to the customer's carrier of choice. Each call is identified as a relay call. If a relay user has signed up with his/her carrier of choice for a "relay" discount or the carrier is required to give a relay discount, the carrier will bill the call as a relay call and apply any discounts. Relay Utah users will receive one bill from their carrier of choice just like they do for all of their direct calls. Relay Utah explains this type of billing arrangement through all Outreach and Customer Service activities, in newsletters, relay materials, etc. so that relay users understand how to select a carrier and find the best long distance rates.

The section below (under the heading End User Billing for all Toll Calls) contains a description of how end users are billed for toll calls.

#### Inbound International Calls

Relay Utah provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Relay Utah then

places the outbound call to a destination in the United States free of charge and relays the conversation for them. All processed International calls are billed to the Interstate TRS Fund Administrator.

#### End User Billing for all Toll Calls

Interlata (including interstate and international) and intralata and intrastate long distance toll charges are recorded and billed by the relay users' carrier of choice in the same manner as the carrier bills that customer for direct interstate and intrastate long distance calls. On each interlata and intralata call, Relay Utah forwards the appropriate information digits, calling number and called number as part of the call information so that the long distance company can bill the customer directly or through their normal billing mechanisms.

Relay Utah forwards information on each toll call to the relay user's carrier at the time the relay call actually takes place. The record will contain: the originating and terminating numbers and the call type (e.g., person-to person, collect). Interlata and intralata billing records will be created by the interexchange carrier as a result of the information digits and calling and called number data being sent to the interexchange carrier at the time the call is made. Long distance charges are based on the originating and terminating numbers. The long distance carrier bills are based on conversation time using their own rounding calculations. Relay Utah does not pass on session time to the carrier so only conversation time is billed by the carrier. Billing and collection is then the responsibility of the interexchange carrier who carries the call.

Relay Utah's provider has the unique advantage in the industry of being a relay provider which is not an IXC. The customer's carrier of choice actually bills the call (based on conversation time) for intralata, interlata, and international calls. This means that the timing of the call for billing purposes begins immediately upon pickup at the called number. If a caller requests a person-to-person toll call, the timing begins only after the requested person has answered the call. If a relay user has signed up with his/her carrier of choice for a "relay" discount or the carrier is required to give a relay discount, the carrier will bill the call as a relay call and apply any discounts. Relay Utah bills no calls and receives no revenue. All billing is performed by the carrier.

The format of the bill for all toll calls will be determined by the carrier as the Relay Utah does not bill any relay calls. However, the call digit information will identify the call as a TRS call and will further designate the type of call (i.e. 3rd number calls, direct dial call, collect call and person-to-person call). This will allow carriers to correctly identify each relay call on their bill.

All billing to the relay user is based on minutes of conversation and is processed by the relay user's carrier of choice.

Relay Utah has the ability to place the following call types:

Bill to ANI	Person to Person
Third Party	PP - Bill to ANI
Collect	PP – Third Party
Calling Card/Credit Card	PP – Collect
Prepaid Calling Cards	PP – Calling Card/Credit Card

### **Automated Billing System to Determine Call Jurisdiction**

Relay Utah's provider makes use of an automated billing system to determine call jurisdiction. Relay Utah's provider marks on every billing record whether the call is local, EAS, intrastate or interstate. This is done immediately when the call is placed. Relay Utah's provider performs a second check of call jurisdiction during the monthly settlement process. By determining the jurisdiction of every relay call twice, Relay Utah's provider can guarantee that call jurisdictions are established correctly and that Relay Utah will only pay for intrastate relay minutes. In addition to redundant jurisdiction look-ups, Relay Utah's provider also accounts for every minute of relay use. This means that all reports must balance at the end of every month in each jurisdiction category. This additional safeguard ensures that all minutes are accounted for correctly.

*(iv) Relay services shall be capable of handling pay-per-call calls.*

### **Pay-Per-Call Services**

Relay Utah allows relay users to access intrastate and interstate 800 or 900 pay-per-call services in which the company providing the service bills the end-user directly. Relay Utah has established the necessary trunking to the carriers participating in relay equal access so that the carrier can bill directly for this call.

Relay Utah's provider bills the Interstate TRS Fund and The Utah Public Service Commission using the percentage split defined by the Interstate TRS Fund Administrator for 800 and 900 calls. Customers may choose to block 900 calls from being made altogether via forms provided by Relay Utah.

*(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.*

### **TTY/ASCII to Voice**

Relay Utah is able to accept a call from a TTY equipped caller, place a call to a hearing and voice capable caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

### **Voice Call Processing**

Relay Utah is able to accept a call from a hearing and voice capable caller, place a call to a text based caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

### **Voice Carryover (VCO)**

Relay Utah allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of VCO call types are also available through Relay Utah.

### **Two-Line VCO**

Two-line VCO capability allows a VCO user to have a more interactive conversation. By using two telephone lines the caller, if they have some hearing available, can listen to their conversation on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

### **Reverse Two-Line VCO**

Hamilton's Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

### **VCO-TTY and TTY-VCO**

Relay Utah provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

### **VCO-VCO**

Relay Utah provides VCO to VCO service where the CA types to both parties, saving the VCO users from having to type their part of the conversation.

### **Hearing Carryover (HCO)**

Relay Utah allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of HCO call types are also available through Relay Utah.

### **Two-Line HCO**

To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

### **HCO-TTY and TTY-HCO**

Relay Utah provides his feature allowing HCO users to contact TTY users (or vice versa) via the relay.

## **HCO-HCO**

This service allows two HCO users to contact each other through the relay. Relay Utah provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation.

*(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.*

## **TTY to TTY (Call Release)**

Relay Utah processes TTY to TTY calls when it is necessary to go through a voice switchboard first or if the originating TTY user is using a calling card that is accessed by calling an 800 number first. Once the CA reaches a compatible TTY user when placing a relay call, Relay Utah gives the calling party the option to communicate independent of the relay function.

The CA receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the CA is able to take any other incoming calls.

Using the above procedure, Relay Utah provides a true call release function to satisfy the FCC requirement, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e., the relay user's carrier of choice).

## **Voice to Voice Call Release**

Relay Utah provides a voice to voice call release function, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice). Once the call has been released from the workstation, the call ceases to be a TRS call and is not subject to the per-minute charge to the State.

## **Speed Dialing**

Relay users may choose up to 50 numbers they would like programmed for speed dial. When a Relay user makes a call to a number on their speed dial list, they first connect to the CA and just tell the CA, "pls call Mom". Speed dialing is available through Relay Utah customer profile.

## **Three-Way Calling**

Relay Utah provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

*(vii) Voice mail and interactive menus. CAs must alert the TRS user to the*

*presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.*

### **Machine Recording Capabilities**

Relay Utah's recording function allows the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informs the relay user through the use of a hot key on the CA's terminal that a recording has been reached, followed by another hot key stating (CA HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requests a department or live person, the CA types, "HLDING FOR DEPT/PERSON" and presses the appropriate option when the recording prompts.

If a caller requests listening to the complete message, the CA sends a hot key that states, "COLLECTING INFO PLS HLD" and the CA continues to collect the recording.

The message is retained only for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system.

When Relay Utah has to redial to an answering machine, voice mail, interactive voice messaging unit or any other type of recording system, for whatever reason, Relay Utah does so without billing the customer for any subsequent long distance relay calls.

*(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.*

### **Answering Machine and Voice Mail Retrieval**

Communication Assistants are trained in retrieving and relaying TTY messages to voice users and voice messages to TTY users from voice processing systems. Communication Assistants use the following procedures to obtain messages for relay users:

1. The user is informed that the Communication Assistant has reached a voice processing system.
2. If the user requests message retrieval, Relay Utah obtains the appropriate access codes from the user. Relay Utah does not retain access codes or any other information needed to access a voice mail system subsequent to the call. This information is considered "call" information and just like any other call information, is kept confidential.

3. After the voice processing system has been accessed, Relay Utah's Communication Assistants begin to relay any messages that have been recorded or leave a message as requested. Relay Utah makes use of its advanced recording function to capture this information as discussed previously.
4. If the Communication Assistants must call again to finish relaying any messages, Relay Utah Communication Assistants do so without billing the end user for subsequent calls.

Relay Utah alerts relay users to the presence of a recorded message and/or interactive menu. Relay Utah uses hot keys (automatic macros) to announce recordings or interactive messages. Relay Utah does not charge a relay user for subsequent calls to a recording or to interactive message.

#### **Answering Machine Retrieval (Single-Line)**

Relay Utah provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the CA. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Communication Assistant by putting the handset near the speaker of the answering machine. Relay Utah records any messages, enabling the Communication Assistant to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

*(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.*

#### **Procedure for Handling TRS Emergency Calls**

Relay Utah's provider uses a national Emergency Call Relay Center, operated by Intrado, Inc., for the provision of handling emergency relay calls.

Relay Utah uses Intrado and follows the procedures below:

- If the caller has the local emergency number which needs to be accessed, the call is promptly placed and handled in the same manner as any other relay call.
- In the event that a caller does not have the access number to 911 and the emergency appears to be of a nature that time will not permit the caller to hang up and call directly to 911, the CA will contact the Emergency Call Relay Center (ECRXC) which is accomplished through one stroke on the keyboard.

- Simultaneously, the CA obtains the address from which the person is calling from and selects the “emergency call” box option on the software at the workstation. (A Supervisor assists every 911 call. When a Communication Assistant makes this selection, a Supervisor is notified immediately as a flag indicator on the Supervisor Console is activated.)
- Once connected to the ECRC, the CA will identify as a TTY relay call and relay the location of the caller. (If the CA does not obtain location information, the CA gives the ECRC the ANI of the caller.)
- The ECRC immediately transfers the call to the appropriate PSAP center. The ECRC drops off the call once confirming that both parties are on the line and the correct PSAP has been reached. The CA processes the call as normal.
- Relay Utah passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

### **Back-up Emergency Procedures**

As a back-up to Intrado in the event that Intrado is unable to match the caller with the appropriate PSAP, Relay Utah's provider has procedures in place to access its own emergency database:

- The software used by Relay Utah takes the NPA/NXX information from the ANI of an incoming call and matches it to information in its database. The ANI indicates what city or location a call is coming from. This NPA/NXX information is then cross-referenced to a list of locations in Utah stored in the database. Relay Utah has mapped each NPA/NXX in Utah to the appropriate PSAP. Once this search is complete (it only takes a second) the correct emergency telephone number is loaded automatically into the "outdial" box and the Communication Assistant can immediately dial the appropriate emergency personnel. This process ensures that Relay Utah users have access to the correct and appropriate PSAP.
- Relay Utah passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.
- If the caller is using a cellular or wireless phone, the ANI is not a good indication of where the caller is actually positioned. In this case, the CA asks for the nearest city name and initiates an automated search for the appropriate PSAP. If several PSAPs are listed for the same city, the CA will try to identify the correct one with a quick question to the caller.
- Relay Utah's emergency database application described above meets the current requirements established by the FCC.

### **FCC Rules for Emergency Calls**

In the June 2004 order, the FCC adopted the definition of “appropriate” PSAP as “either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.” Relay Utah’s database automatically and immediately transfers the caller to the appropriate Public Safety Answering Point based on NPA/NXX information.

The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). Relay Utah accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP:

- 1) through the use of Intrado’s 9-1-1 infrastructure and
- 2) through the PSAP database maintained by Utah's provider.

### **TTY to TTY Communications Between PSAP and Caller**

Relay Utah will process direct TTY to TTY communications between the PSAP and the TTY caller.

### **If a Caller Disconnects Before Being Connected to the PSAP**

In the event that a caller disconnects before being connected to the PSAP even if the CA is unable to get the number of the caller before the call is disconnected, the workstation contains a notification feature that initiates a command to write a record of the ANI calling for emergency assistance. The Supervisor can then access this information if needed, so no matter when the caller hangs up, Relay Utah can send the correct ANI information to the 911 center.

The Supervisor will contact the appropriate 911 center and give the dispatcher any pertinent information collected on the call. This includes ANI for the caller so that if the 911 center has “Enhanced 911 Services”, emergency personnel will be able to locate where the person in need is calling from.

During the course of emergency 911 calls, the CA continually solicits as much information as possible about the nature of the emergency so that in the event that the caller cannot complete the call for any reason, the CA may have an opportunity to seek out the appropriate emergency assistance. The CA then gives the dispatcher any pertinent information collected on the call even if the originator of the call has disconnected. This includes ANI for the caller so that if the 911 center has “Enhanced 911 Services”, emergency personnel will be able to locate where the person in need is calling from. This meets the FCC’s current requirement where a CA must pass along the caller’s telephone number to the PSAP when a caller disconnects before being connected to emergency services. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help.

The emergency call plan used by Relay Utah follows this section. This covers the scenario of a relay user disconnecting before the call is completed. If the 911 call is completed, the CA will follow normal relay procedures with the assistance of a supervisor and the caller's ANI is transferred to the appropriate PSAP as described above.

**911 Procedures if the caller disconnects before the emergency call to the PSAP is completed:**

Call the 911 Dispatch number that is listed in the Emergencyfile.txt or the emergency dispatch numbers file ASAP (all of this is immediately available on the CA's workstation screen). Remember this is a 911 call.

When you reach the 911 dispatch operator use the following steps:

1. **Greeting:** This is "CA XXXX" from "State" Relay Center. We just received a 911 call that wasn't completed. The caller uses a TTY and may be Hard of Hearing, Speech Disabled, or Deaf. The ANI is XXX-XXX-XXXX.
2. Ask the 911 dispatch operator if they have a TTY. If they do not proceed to item "3". Ask if they know how to use the TTY. If they don't know how to use the TTY proceed to item "3". If they know how to use the TTY proceed to item "5".
3. Give the 911 dispatch operator the Voice relay number for the correct state.
4. Ask the 911 dispatch operator if they know how to use the relay.
  - Relay Explanation  
The person you are calling through relay will be typing their conversation and the CA will read it to you.
5. Ask the 911 dispatch operator for their name or operator number. Record this information on the CA's Emergency Call Slip.

Through its outreach programs and outreach materials, Relay Utah educates relay users about how to use 911 services. As a part of this information, Relay Utah encourages relay users to call 911 direct and to contact their local emergency service personnel using a TTY to ensure that the 911 center will process a TTY call correctly in the event of an emergency.

In addition, Relay Utah gives presentations to 911 centers routinely as part of its outreach program. Relay Utah provides training and other assistance to emergency dispatchers to ensure TTY calls or relay calls are handled correctly.

*(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.*

**Speech to Speech**

STS service allows individuals with a speech disability to use his/her own voice or a speech synthesizer when using the relay. STS users are able to communicate with any

and all relay users including but not limited to VCO, HCO, TTY, 2LVCO, other STS users or standard phone users. Specially trained CAs process Speech to Speech calls. STS is also available in Spanish.

Relay Utah's provision of Speech to Speech meets all FCC requirements for Speech to Speech call processing.

STS CAs are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention as required by the FCC.

Relay Utah provides STS users the same profile and all of the features contained within that profile which are currently available to other relay users. Relay Utah has a feature, which allows all relay users, including STS users, to maintain a list of names and telephone numbers. A relay user simply gives the name of the person to call to the CA. The CA repeats the name and states the number of the person to call. The Speed Dial feature is of great benefit to STS users.

Relay Utah complies with the 15-minute requirement prior to changing STS CAs. A Supervisor must approve and facilitate a STS CA change. Relay Utah exceeds the FCC standard for substitution of STS CAs.

If a change in STS CA is necessary, another CA will replace the CA relaying the call at the same workstation so that the relay user's call is not interrupted except to identify the new CA to both parties. The replacement STS CA will announce, "This is CA# \_\_\_\_ continuing your call." A supervisor monitors the change and must approve the change based on the caller's request or emergency circumstances.

All STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. This information is retained only for the duration of the inbound call. STS CAs retain any important information given by the STS user which might be difficult for the STS relay user to repeat (i.e. credit card numbers, telephone numbers, account numbers, etc.) for use in a subsequent outbound call. Relay Utah places a great emphasis on maintaining the confidentiality of relay users. As a result, all information is destroyed immediately upon termination of the inbound call. The above meets all FCC requirements for Speech to Speech call processing.

**§ 64.604 Mandatory minimum standards.**

*(b) Technical standards –*

*(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.*

Relay Utah is capable of receiving and transmitting using Voice, Turbo Code, ASCII or Baudot formats, at any speed generally in use. All equipment is compatible with industry-wide standards. The modems used by Relay Utah can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly.

*(2) Speed of answer.*

*(i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.*

*(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.*

*(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.*

*(B) Abandoned calls shall be included in the speed-of-answer calculation.*

*(C) A TRS provider's compliance with this rule shall be measured on a daily basis.*

*(D) The system shall be designed to a P.01 standard.*

*(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.*

Relay Utah is committed to complying with the speed of answer requirements applicable to relay. Relay Utah answers ninety percent (90%) of calls within ten (10) seconds from the time the call enters the TRS system during all times of the day by any method which results in the caller's call immediately placed, not put in a queue or on hold.

Relay Utah's provider measures Average Answer time from the moment a Relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as the equipment used by Utah's Relay provider accepts the call, call detail records start to capture answer time data. Relay Utah's timing is very accurate as no rounding takes place since this time is measured in seconds. The information reported is taken from Call Detail Records ensuring the accuracy of the data. Each call detail record tracks the amount of time a call waits to be answered. CAs do not answer a call until they are ready to engage the call. Calls in queue or calls receiving the intercept message are not counted as answered. This "queue time" field will be analyzed and reported, but not billed. Abandoned calls are included in the speed of answer calculation.

Relay Utah has the ability to monitor speed of answer on a real-time basis via a monitoring system that is accessible to management and supervisors. This information is utilized to make CA staffing changes throughout the day. Average Answer time is displayed on the supervisor console. The Supervisor workstation and reader boards in the center indicate if calls are in queue waiting to be answered. The Supervisors are responsible for making sure that when that alert comes up that all available CA resources are logged in to the system and answering calls. Each of these tracking mechanisms allows Relay Utah to respond quickly by adding more CAs immediately.

Daily activity reports used for internal management purposes also track answer performance information for future scheduling. In addition, Relay Utah uses a variety of other scheduling techniques to ensure that staffing meets traffic demands. Utah's Relay provider makes use of historical data, trending, call patterns and combines that with the knowledge of current events (e.g. football games, weather, Mother's Day, etc.) to anticipate staffing needs.

Relay Utah has outstanding answer performance. Average answer seconds for the past year were 1.0 with 95% of calls answered in ten seconds or less.

Relay Utah also meets all FCC call blockage standards. Relay Utah's relay service is designed to a P.01 standard. No more than one call in 100 will receive a busy signal when calling the relay center at the busiest hour. Relay Utah defines "blockage" as any call that arrives at the relay switch but is not answered due to the customer receiving a busy signal. Currently, Relay Utah has never come close to blocking 1 call in 100.

The systems used by Relay Utah's are designed to prevent blockage. The switches used are high-speed, stand-alone, non-blocking digital switching matrixes. The system is fully redundant to ensure quality and reliable performance, making blockage or any downtime nearly impossible. The system auto-detects any problems and moves to the secondary system immediately if necessary.

Another measure Relay Utah has taken to prevent blocking is to use networks that make use of SONET survivability technology. All of the networks controlled by Relay Utah - from the point a relay user picks up the phone in their home or business, through the relay and then back to the other phone being called - are redundant and can survive fiber cuts and other such outages.

Relay Utah measures, records and reports its answer performance and blockage rate information to the PSC and abides by the FCC rules (i.e. a LEC shall provide the call attempt and the rates of calls blocked between the LEC and the relay center upon request).

The transmission circuits used by Utah's provider meet or exceed industry interexchange performance standards for circuit loss and noise.

*(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.*

### **Equal Access (Carrier of Choice)**

Relay Utah provides relay users with access to the interexchange carrier of their choice through TRS, and to all other operator services, to the same extent that such access is provided to voice users. Interlata and intralata long distance toll charges are recorded and billed by the relay user's carrier of choice in the same manner as the carrier bills that customer for long distance calls made without the relay. On each interlata and intralata call, Relay Utah forwards the appropriate information digits (identifying the call as a relay call), calling number and called number as part of the call information so that the long distance company can bill the customer at correct functionally equivalent rate through their normal billing mechanisms. Calling card or credit card billing is handled in the same manner. Relay Utah's provider has provisioned the necessary trunks at each of its relay switching tandems for all long distance companies participating in equal access so that they can receive Relay Utah traffic. Relay Utah offers equal access to all carriers who choose to participate.

Relay Utah provides relay users with access to all other Operator Services to the same extent as that provided to voice users. Operator services are handled in the same manner as explained above. All operator assisted calls are sent to the customers' carrier of choice for processing and billing.

The type of arrangement explained above gives the control to the relay user. The relay user can pick their carrier of choice, receive one bill for all of their calls, and the relay user can shop for the best rates, just like they do today for calls not made through the relay. The relay user can continue to work with one carrier and the relay remains invisible.

The customer profile program used by Relay Utah is based on the relay users' ANI that provides automatic connection to the carrier of choice for both interlata and intralata calls made by the relay user. Relay users complete a customer profile with their carrier information and Relay Utah adds this information to its database. On each subsequent relay call relay users are automatically connected to their carrier of choice. Relay users can also notify the CA of their carrier of choice when making a long distance relay call. In the event a relay user elects to change his/her carrier of choice, the CA is able to do so.

Relay Utah offers 1010 dialing through the relay. This service is functionally equivalent to using 1010 services when not placing calls through the relay.

In order to obtain new carriers on its platform, Relay Utah contacts all carriers that are requested by Relay Utah users to see if they will participate in relay equal access. Utah's Relay provider then works through ordering and testing phases with that carrier to ensure that the carrier becomes available to Relay Utah users. Utah's Relay provider maintains a list of participating long distance carriers and makes this information available to relay users.

*(4) TRS facilities.*

*(i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.*

Relay Utah provides telecommunications relay service 24 hours a day, 7 days a week. .

*(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.*

The facility used by Relay Utah has the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day. Relay Utah is operated from a center located in Albany, Georgia. Relay Utah calls automatically overflow during peak volume times and during any failure of switching or telecommunications facilities to other centers operated by the Relay Utah provider. This ensures continuous operation of the Relay Utah.

The switches and relay platforms used by Relay Utah's provider's are located in the Louisiana and the Nebraska relay centers. Workstation equipment, database information, and CA are located in all relay centers. Workstations in the Maryland and Massachusetts centers are controlled by the main processing and switch unit located in Nebraska via digital telecommunications facilities which are redundant T -1 circuits. Workstations in the Utah Center are controlled by the main processing and switch unit located in Louisiana via digital telecommunications facilities which are redundant T -1 circuits. All incoming relay calls enter the relay provider's network. Calls can then be connected to workstations in any of the Relay provider's facilities. This all happens instantaneously with no call delays. Calls made to the terminating party exit through the call network as well. Relay Utah users receive outstanding call processing and superior answer performance as a result of this network configuration.

**Uninterruptible Power**

All relay centers operated by Utah's Relay provider make use of an uninterruptible power source with full battery backup to operate each center at full capacity for extended periods of time. In addition, battery back-up systems have the capability to automatically connect to a generator at each of its existing relay centers. The combination of battery and generator back-up allows Relay Utah's provider to provide relay service for days and weeks at a time during power outages.

The power system supports the switch system and its peripherals, switch room environmentals (air conditioning/heating, fire suppression system, emergency lights & system alarms), CA consoles/terminals, CA work-site and lighting and Call Detail Record recording at each center. Employees are given procedures to follow in the event of emergency.

Utah's Relay provider provides auxiliary power sources for nine central offices in addition to all its relay centers and has significant experience at purchasing, installing, testing and insuring that such back-up equipment is in place. All of Hamilton's back-up power systems have redundancy features functionally equivalent to the equipment in normal central offices including uninterruptible power for emergency use.

### **Switching System**

Relay Utah provider's second generation relay platform makes use of an Excel telecommunications switch. Its switch is a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allow for simplified and cost-effective application development. The switch supports up to 2,048 ports in a single high-density system. Its components include a matrix CPU, network interface cards, Digital Signal Processing service cards and SS7 packet engine cards. The switch adapts to all standard network and line interfaces, including T1, E1, 11, and ISDN PRI.

The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the Excel Inc. programmable switching platforms. The ISOS can simply be loaded on a UNIX host, and plugged into the switch to offer basic tandem type switching capabilities including routing and call detail records.

The ISOS is a fully operational basic switch and has great flexibility. Utah's Relay provider took advantage of this flexibility and has customized many relay functions in the ISOS operating system.

The relay workstation application takes advantage of the power and flexibility of the ISOS operating system. It provides a high level of Communication Assistant control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database was developed to maintain a profile of each caller to speed up call connections and to provide information for tailored call processing. The switching systems contain a fully redundant central processing unit on hot standby with automatic failover. This is to ensure that no calls are dropped due to technical failure. It also has a redundant power supply on hot standby. Backup control and database servers are also on hot standby with automatic failover. Utah's Relay provider maintains an inventory of spare critical components for the switching system onsite to ensure that the required levels of service are met (listed below).

The on-sight switching system spare equipment includes:

- D4 channel bank
- All required channel bank cards
- T1 CSU packs
- Switch T -1 card
- Switch conference card

If one of the switching systems cannot be returned to service by transferring control to redundant equipment, the calls automatically will overflow to another switching system. The switching systems are designed to provide a very high level of operational security with two fully redundant processors and power supplies in each switch. Each fully redundant control system, which includes keyboard, monitor and printer capabilities, is used to control and monitor each of the switching systems. The control systems provide online system monitoring and real-time programming capabilities that will not take the system off-line and the ability to perform preventative maintenance or repair while the system is online. Remote capabilities are also provided so the system can be remotely monitored, reconfigured or controlled as necessary. All of this is provided to ensure the required levels of service are always met.

Utah's Relay provider has made changes to its relay platform in recent years, making use of leading edge technology. It has upgraded its switching servers to new hardware that evolved its switching operating system from 32 bit UNIX to 64 bit Linux for more robust hardware support; and tested and deployed new switching control code which allows additional ad hoc reporting capabilities for comprehensive traffic analysis and enhanced failover and recovery. Utah's Relay provider has also replaced database servers with new hardware and replaced legacy profile database servers with SQL servers for improved redundancy and database management. Finally Utah's Relay provider has completed a multi-year upgrade of all production workstations to newer, standardized hardware; upgraded workstation operating systems from 16 bit to 32 bit which provides a higher level of stability; and rolled out several new workstation versions to support a variety of new features.

*(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.*

### **Upgrades in Technology/Process in Determining of Technology is Reliable**

Using flexible software and hardware (i.e. standard carrier switch, common equipment frames, standard T1 interfaces, windows servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology, the platform used by Relay Utah is ideal for today's rapidly changing technologically advanced environment. Relay Utah's provider takes advantage of innovations and technological improvements to enhance the state of Utah's relay service.

### **Signaling System Seven (SS7)**

The relay platform used by Relay Utah has made use of SS7 signaling since February 2002. The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services are delivered today in the public switched network (i.e. Relay Utah provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

*(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.*

**True Caller ID**

Through the use of SS7 signaling Relay Utah provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box. Relay Utah provides this information on all call types and on all carriers. Relay Utah brings true functional equivalence to Caller ID relay users.

Relay Utah receives and passes calling line identification information, including blocking information from all users calling through the relay service.

**§ 64.604 Mandatory minimum standards.**

*c) Functional standards —*

*(1) Consumer complaint logs.*

*(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.*

Relay Utah tracks all TRS complaints and all other customer service activity. Relay Utah maintains a log of consumer complaints alleging a violation of federal minimum standards as it relates to the provisioning of Telecommunications Relay Service and retains the log for the State until the FCC grants the next application for certification.

All complaints made through the toll-free Customer Service number, the customer inquiry form or on-line feedback form, whether in writing or in person, are documented in the Customer Service database. All resolutions are also documented in this database. **All information is kept on file and available to the Utah Public Service Commission (PSC) and FCC.** Each database record includes the name and/or address of the complainant, the date and time received, the Communication Assistant identification number, the nature of the complaint, the specific relief or satisfaction sought, the result of the investigation, the resolution of the complaint and date of the resolution. The customer service representative responsible for handling the complaint is also indicated.

The PSC's complaint log consists of the following database categories:

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Accuracy/Spelling/Verbatim
- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Hung Up on Caller
- CA Misdialed Number
- CA Typing Speed
- Didn't Follow Voice Mail/Recording Procedure
- CA Typing
- Improper Use of Speed Dialing
- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release

- Improper Handling of Three Way Calling
- Caller ID Not Working Properly
- Improper Use of Customer Data
- Fraudulent/Harassment Call
- Replaced CA Improperly in Middle of Call
- Didn't Follow Emergency Call Handling Procedure
- CA Didn't Follow Policy/Procedure
- Confidentiality Breach
- Spanish to Spanish Call Handling Problems
- Miscellaneous Service Complaints
- Ringing/No Answer
- Speech to Speech Call Handling Problems
- Connect Time (TTY-Voice)
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems
- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access
- CapTel Complaints

*(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.*

Relay Utah's provider reports complaint activity to the PSC on a monthly basis. The PSC submits the necessary information to the FCC as required in § 64.601 Mandatory Minimum Standards on an annual basis. The PSC has submitted copies of its 2008 through 2012 complaint logs to the FCC. The provider for Relay Utah issues each complaint a Record ID number to enable the PSC and the FCC to quickly and easily identify the details of those particular complaints and contact information of the complainants.

*(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:*

*(i) The name and address of the office that receives complaints, grievances,*

*inquiries, and suggestions;*

*(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and*

*(iii) The physical address to which correspondence should be sent.*

The Utah PSC submitted to the Commission a contact person for TRS consumer information and complaints about Intrastate TRS. The submission includes the name and address of the State office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, web address, and physical address to which correspondence should be sent. Following is the name of the contact at the PSC for those purposes:

Public Service Commission of Utah  
Gary Widerburg,  
Heber M. Wells State Office Bldg., 160 East 300 South, 4th Floor  
P. O. Box 45585, Salt Lake City, UT 84145-0585  
Tel/TTY 801-530-6769; FAX 801-530-6796; Voice 801-530-6716

The Hamilton Telephone Company d/b/a Hamilton Telecommunications, the provider of Relay Utah, has submitted to the Commission a contact person for TRS consumer information and complaints about Hamilton's service. The submission includes the name and address of the state office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, and physical address to which correspondence should be sent. Following is the name of the contact at The Hamilton Telephone Company for those purposes:

Dixie Ziegler  
Vice President of Relay  
Hamilton Relay, Inc.  
1006 12th Street  
Aurora, NE 68818  
Voice/TTY 402-694-3656  
Fax: 402-694-5037  
E-mail: [dixie.ziegler@hamiltonrelay.com](mailto:dixie.ziegler@hamiltonrelay.com)  
Website: [www.hamiltonrelay.com](http://www.hamiltonrelay.com)

*(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1,*

*2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.*

### **Community Outreach, Public Relations and Educational Programs**

Relay Utah provides community and business outreach and promotes a public awareness campaign to educate all Utah citizens about the relay service. These efforts educate and heighten public awareness of 7-1-1 and TRS throughout Utah through marketing, advertising and community involvement. In compliance with FCC requirements, which call for outreach to all telephone users, Relay Utah's outreach initiatives focus on the need to educate the hearing community. As it has been in the past, the primary outreach concern is the number of hearing people who hang up on relay calls. Through participation in promotional events, presentations, workshops and instructional seminars, Relay Utah reaches out to all relay user communities and always adjusts its programs to meet the specific needs of every audience.

Relay Utah's outreach and awareness efforts specifically target individuals who are deaf, hard of hearing, late deafened, deaf-blind or have difficulty speaking, as well as their family, friends and caregivers. Relay Utah performs a variety of activities to inform the public about relay and regularly participates in activities held by Utah organizations that serve relay users.

The outreach team offers informative presentations on the features of relay services to organizations, relay user groups, businesses, educators and students, health care providers, 9-1-1 call centers, emergency, fire and law enforcement personnel, libraries, senior centers, and public and private entities. Relay Utah's statewide outreach and awareness efforts include:

- Presentations
- Exhibits
- 911 Education
- Strategies for reaching Hard to Reach Relay Users
  - Hard of Hearing and Elderly Strategies
  - Speech to Speech
  - Deaf Blind
- Outreach to Businesses and Educational Institutions
- Outreach to Spanish
- Equipment Distribution Programs
- Involvement of Deaf and State Agencies
- Customized Outreach materials
- Promotional Materials
- Variety of Brochures
- Description of Complaint Procedures in Printed Materials
- Bill Inserts and Directory Pages
- Newsletters
- TRS and CapTel Web sites
- Social Media
- Press Release and Public Relations
- Print Advertising

- Media Advertising

Please refer to Attachment B for sample outreach materials and a list of the outreach activities Relay Utah has accomplished.

*(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.*

Relay Utah's provider performs no billing. All billing is performed by the relay users' carrier of choice for both intralata and interlata toll calls. Thus the relay users' carrier of choice bills all intralata and interlata toll calls at their applicable discounted rate for relay users. Relay Utah's provider forwards the appropriate information digits identifying the call as a relay call to the carrier so that it can be identified as a relay call, rated and billed accordingly by the carrier. Each carrier providing long distance service to relay users is responsible to ensure that TRS users shall pay no greater than the rates paid for functionally equivalent voice communication services.

*(5) Jurisdictional separation of costs —*

*(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.*

Relay Utah's provider presents the Interstate TRS Fund with a billing statement for all interstate minutes of relay in accordance with the requirements of the Interstate TRS Fund and consistent with FCC rulings. All intrastate minutes of use are compensated from the Relay Utah Fund.

*(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.606, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.*

Please refer to Tab 7, Method of Funding for a complete description of the State of Utah's funding mechanism.

*(6) Complaints —*

*(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.606 is in effect, the Commission shall refer such*

*complaint to such state expeditiously.*

*(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.*

The Utah PSC will resolve all intrastate complaints within 180 days after the complaint is first filed with the State, regardless of whether the complaint is filed with the state relay administrator, a state PUC, the relay provider or with any other state entity.

*(iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:*

*(A) Final action under such state program has not been taken within:*

*( 1 ) 180 days after the complaint is filed with such state entity; or*

*( 2 ) A shorter period as prescribed by the regulations of such state; or*

*(B) The Commission determines that such state program is no longer qualified for certification under §64.606.*

The Utah PSC understands that if it does not provide a resolution to a complaint that the FCC may exercise jurisdiction.

*(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.*

The Utah PSC understands that the Commission will resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

*(v) Complaint procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.*

*(A) Informal complaints —*

*( 1 ) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone*

*(voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.*

*( 2 ) Content. An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).*

*( 3 ) Service; designation of agents. The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.*

*(B) Review and disposition of informal complaints.*

*( 1 ) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.*

*( 2 ) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the*

*Commission pursuant to paragraph (c)(6)(v)(C) of this section.*

The Utah PSC will assist as necessary in this process.

*(C) Formal complaints. A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:*

*( 1 ) The name and address of the complainant,*

*( 2 ) The name and address of the defendant against whom the complaint is made,*

*( 3 ) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and*

*( 4 ) The relief sought.*

*(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.*

*(E) Number of copies. An original and two copies of all pleadings shall be filed.*

*(F) Service.*

*( 1 ) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.*

*( 2 ) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.*

*(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission*

*in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.*

*(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.*

*(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.*

The Utah PSC will assist as necessary in this process.

**Supplemental Information:**

Intrastate Relay Utah complaints are processed in the following manner for the PSC by its TRS provider:

Trained personnel answer all Relay Utah Customer Service calls. Relay Utah provides a 24 hour a day, 7 days a week customer service via a toll-free telephone number, accessible from anywhere in the U.S., to assist TTY and voice callers with Utah TRS inquiries and complaints. Customers may also contact Relay Utah via e-mail and through the Relay Utah web-site; in person; as well as in writing. Any caller to the relay center having a complaint can reach a supervisor or customer service representative while still on line during a relay call. Relay Utah processes any complaints, which originate via e-mail, fax, telephone, regular mail, outreach events, at the workstations, etc.

Ultimately responsible for processing all inquiries, comments and complaints is Relay Utah Customer Service department. The National Customer Service Manager, Center Manager and Vice President of Relay Service for Hamilton also view all complaint information. In the event of a complaint regarding the Relay Utah, trained staff will follow an established procedure of complaint resolution. This process varies depending on the gravity of the situation.

- A Complaint involving a Communication Assistant is directed to the Communication Assistant's Supervisor and the Lead Supervisor. Constructive feedback will be shared with the Communication Assistant and appropriate coaching, re-training and counseling steps will be taken by the primary Supervisor

to resolve the situation. Relay Utah's detailed call records show each key command (not actual text) the CA makes. Relay Utah can easily investigate Relay Utah CA complaints and take disciplinary action when needed.

- Complaints regarding service/procedure issues are directed to the appropriate internal personnel. Technical issues are given to the technical support staff and addressed immediately. Procedural issues are discussed at internal quality meetings.

All complaints are reviewed by the National Customer Service Manager to ensure that any complaints have been resolved to the customer's satisfaction. The Customer Service Team resolves most customer service complaints. If further action is needed, the complaint is escalated to the Vice President of Relay Service for Hamilton, and then to the Utah PSC when needed. All complaints are resolved within 10 calendar days depending on the complexity of the problem. Relay Utah describes the above procedures and FCC complaint processes, including contact information for both Utah PSC and the FCC, in appropriate printed outreach material that is distributed to the general public.

If the user is not satisfied with the resolution of the complaint by Relay Utah or with any action taken, Relay Utah's monthly report to the PSC will so state. The user then has the opportunity and is given written notice of that opportunity by Relay Utah to have the complaint and action of Relay Utah reviewed by the PSC for such action as it may deem appropriate in accordance with its rules and regulation. The Utah PSC will act on such complaint no later than 180 days from the filing of the complaint.

The Utah PSC will process all complaints referred by the Federal Communication's Commission for intrastate Telecommunications Relay Service for the State of Utah. The PSC will cooperate in the investigation or resolution of any and all complaints concerning the Relay Utah with the Federal Communication's Commission.

*(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.*

The contract between the PSC and The Hamilton Telephone company d/b/a Hamilton Telecommunications provide for the transfer of TRS customer profile data from Hamilton to the incoming TRS vendor. Hamilton will provide the above mentioned data to the new vendor at least 60 days prior to the conclusion or termination of the contract.

Hamilton does not and will not use this data for any purpose other than connecting the Relay Utah user to his/her called party. Hamilton has not and will never make any relay information available for sale or distribution. Hamilton will not sell, distribute, share or reveal in any way the information referenced above.

**§ 64.606 Internet-based TRS provider and TRS program certification.**

*(a) Documentation —*

*(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned “TRS State Certification Application.” All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.*

The State of Utah is currently certified to provide intrastate TRS through July 26, 2013. This application is submitted to re-certify the State of Utah for an additional five years.

*(b)*

*(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:*

*(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;*

Please refer to the Operational Standards, Technical Standards and Functional Standards sections of this application for a description of how the State of Utah meets or exceeds all operational, technical and functional minimum standards contained in §64.604.

*(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and*

Please refer to Tab 1 for a copy of the State of Utah's rules and regulations governing telecommunications relay service. The Utah Public Service Commission (PSC) regulates the provision of telecommunications service in the State of Utah and has established rules and procedures for service standards as well as complaint resolution and other necessary enforcement remedies. The contract entered into between PSC and Hamilton Telephone Company provides that all state and federal laws shall be complied with. Failure to do so by Hamilton would be a breach-of-contract for which PSC could terminate the agreement with Hamilton and seek such other remedies as may be available by law. Consumers also have the opportunity, pursuant to the established rules of the PSC, to file complaints or petitions concerning Relay Utah requesting modifications in the provision of this service or otherwise resolving issues or concerns of the public.

*(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes [that its program in no way conflicts with federal law].*

As demonstrated in the following section, where the Relay Utah program exceeds the mandatory minimum standards contained in §64.604, Relay Utah establishes that its program in no way conflicts with federal law.

Relay Utah does exceed some of the mandatory minimum standards contained in Section 64.604 in terms of the following items:

### **CA Training and Procedures**

Relay Utah not only meets, but also exceeds FCC Communication Assistant standards in the areas of hiring and training practices, typing speed to accuracy and in-call replacement of CAs.

### **Ability to TYPE at 60 wpm**

Relay Utah Communication Assistants must TYPE 60 words per minute. **Relay Utah exceeds this service level by requiring CAs to maintain a high accuracy level in addition to 60-wpm typing.**

### **Turbo Code**

Relay Utah exceeds the FCC requirement that TRS shall be capable of communicating with ASCII and Baudot formats, at any speed generally in use. Relay Utah provides Turbo Code, a proprietary alternate protocol developed by Ultratec, as an enhanced protocol and has secured a license from Ultratec to use this protocol in its relay modems. Relay Utah users are able to automatically connect “Turbo Code” on every relay call type. With Turbo Code, Relay Utah users can use their Turbo Code Interrupt feature.

### **Intrastate Spanish**

In addition to Interstate Spanish to Spanish, Relay Utah provides Intrastate Spanish to Spanish, Spanish to English and English to Spanish call handling to the relay users of Utah and processes all the same call types on its Spanish lines as it does on its English voice and TTY lines.

When recruiting and training bilingual CAs, Relay Utah requires Spanish CAs pass a Spanish test, attend a Spanish orientation class and take all standard CA and Speech to Speech training prior to relaying Spanish to Spanish calls.

### **SS7 Signaling**

The relay platform used by Relay Utah has made use of SS7 signaling since February 2002. The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services are delivered today in the public switched network (i.e. Relay Utah provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party’s Caller ID box).

## **Captioned Telephone Service (CapTel)**

Relay Utah provides Captioned Telephone service 24 hours a day, 7 days a week, 365 days a year in a manner that is functionally equivalent to traditional voice calls.

Captioned Telephone users place a call in the same way as dialing a traditional phone. As they dial, the CapTel phone automatically connects to a captioning service. When the other party answers, the CapTel phone user hears everything that is said, just like a traditional telephone call.

## **FCC Captioned Telephone Regulations and Waivers**

The FCC has issued a separate Ruling specifically for Captioned Telephone: Declaratory Ruling on August 1, 2003 CC Docket No. 98-67, FCC 03-190 document. In this Ruling the FCC found that captioned telephone VCO service (Captioned Telephone Service is a form of this) is a type of TRS. In addition the FCC waived certain TRS mandatory minimum standards that do not apply to captioned telephone VCO service, and waived other TRS mandatory minimum standards for captioned telephone VCO (see list below). On July 14, 2005 the FCC clarified that Two-Line Captioned Telephone Service is a type of telecommunications relay service eligible for compensation from the Interstate TRS Fund.

Utah's Captioned Telephone Service offering meets all FCC minimum standards.

The Declaratory Ruling referenced above serves as the primary source in meeting the existing minimum standards including waivers of the six TRS requirements for Captioned Telephone Services. The FCC issued an order on August 14, 2006 (CG Docket No. 03-123, DA 06-1627 document) making these temporary waivers permanent.

### **Captioned Telephone waivers include:**

1. Speech to Speech (STS) and Hearing Carryover (HCO)
2. Communication Assistants waivers:
  - TRS mandatory minimum standard requiring CAs to be competent in interpretation of typewritten ASL as applied to Captioned Telephone CAs.
  - CA oral-to-type test requirement and permit the use of an oral-to-text test instead for Captioned Telephone CAs.
  - Requirement that CAs not refuse single or sequential calls as applied to Captioned Telephone CAs handling outbound Captioned Telephone calls.
  - Gender preference.
  - 60 wpm mandatory typing speed for CAs.
3. Interrupt Functionality
4. Call Release
5. ASCII and Baudot Format

### **Captioned Telephone Training**

All Captioned Telephone CAs are required to satisfactorily complete a series of skills assessments to achieve the expertise and knowledge to adequately and accurately caption in a professional manner the words spoken by the hearing party without intervening in the communication between the parties. The evaluation process includes the quality of voice,

clarity of speech and correct use of words and sentence structure.

A detailed CA training plan is in place to ensure that all standards as applied by the FCC to the provision of Captioned Telephone are met by each Captioned Telephone CA. At any time if a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group.

After initial training, Captioned Telephone trainees are tested through the administration of timing scripts in a test environment. Each CA is required to successfully pass two rounds of timings consecutively prior to handling live calls. In addition, trainees are required to meet specified monitor scores when being evaluated on live call processing. Captioned Telephone Captionists are monitored daily and if a Captionist fails a monitoring, they are not allowed to process live calls until they are able to pass monitoring.

### **Captioned Telephone Ongoing Training**

All Captioned Telephone CAs receive all necessary ongoing training. CAs are monitored on each shift and if they are found to need additional training or re-training, they are taken off line and given the necessary training. In addition, CAs are retrained on new features and capabilities of CTI's Captioned Telephone service platform including any new or improved voice recognition systems used in the platform.

CAs are tested monthly through the administration of Timing Scripts in a test environment. In addition, CAs are periodically monitored while processing live calls. Only the scores of each CA are maintained in a database. No other information regarding conversations is kept at any time.

### **Captioned Telephone Quality Assurance**

One way that quality is measured is through the CA testing program which requires a proficiency level for Captioned Telephone CAs of 130 WPM speed of transcription with a 2% or less Error Rate and 98% accuracy requirement in a testing environment.

### **Captioned Telephone Service CAs adhere to the following minimum standards:**

- The Captioned Telephone CA is trained to caption the words spoken by the hearing party as accurately as reasonably possible without intervening in the communications. The CA is permitted to provide background noise identification;
- The Captioned Telephone CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential;
- The Captioned Telephone CA shall be required to meet the FCC standards for TRS minimum transcription speed;
- The Captioned Telephone CA shall not limit the length of a call and shall stay with the call for a minimum of ten minutes when answering and placing a call;
- The Captioned Telephone CA shall pass along a Captioned Telephone caller's ANI to the appropriate PSAP if the caller disconnects before being connected to emergency services;

- Captioned Telephone personnel have the requisite experience, expertise, skills, education, knowledge and training to perform Captioned Telephone Services in a professional manner.

### **Captioned Telephone Confidentiality Agreement**

All Captioned Telephone CAs adhere to strict policies of confidentiality, which comply with all FCC confidentiality requirements. Utah's Captioned Telephone provider collects only that personal information necessary to provide and bill for the Captioned Telephone service being rendered. Captioned Telephone CAs are also prohibited from intentionally altering a relayed conversation. Following is a Confidentiality Agreement that all CAs are required to sign prior to taking any live calls.

The success of Captioned Telephone depends on quality and complete confidentiality. All Captionists understand and abide by the confidentiality policy.

CAs do not discuss the contents of captioned calls, any caller identifying factors, calling points, or other information about captioned calls other than what is necessary to train other CAs. The CapTel call center is isolated to assure confidentiality standards are upheld. The equipment and structural accommodations made to the CA workspace ensure the confidentiality of Captioned Telephone User's calls, and prevent the Captioned Telephone Users on one call from overhearing a CA processing another call.

**Confidentiality Policy**

- I will not disclose to any individual (outside of a member of the CapTel management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any Captioned Telephone call.
- I will not act upon any information received while processing a Captioned Telephone call.
- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at CapTel Inc.
- I will not share any information about Captioned Telephone calls with anyone except a member of the CapTel Inc. management staff in order to investigate complaints, technical issues, etc.
- I will continue to hold in confidence all information related to the work and calls I have performed while at CapTel Inc. after my employment ends.
- I will NOT reveal my Captionist ID number in conjunction with my name unless asked by a member of the CapTel Inc. management staff.
- I will not share with anyone any technical aspect of my position at CapTel Inc. unless asked by a member of the CapTel Inc. management staff.
- I will not talk about consumers or call content with any fellow Captionists.
- I will not listen to or get involved in calls taken by fellow Captionists.

I have read the above Confidentiality Policy and understand a breach of confidentiality will result in disciplinary action up to and including termination of employment at CapTel, Inc. I recognize the serious and confidential nature of my position and therefore promise to abide by these guidelines.

Employee Name \_\_\_\_\_

Date \_\_\_\_\_

## **Types of Calls**

Captioned Telephone CAs are prohibited from limiting the length of a call and are required to stay with a call for a minimum of ten minutes when answering and placing a call. Captioned Telephone transmits conversations between callers in real time. Utah Captioned Telephone is capable of handling any type of call normally provided by telecommunications carriers, except for those types of calls and call functionality that specifically been waived for Captioned Telephone Services.

## **Change of Captioned Telephone CA**

Utah Captioned Telephone is in compliance with the FCC rule which requires that the CA shall stay with a relay call for a minimum of ten minutes.

The situations in which a CA would change during a call would include:

- 1) More than 10 minutes past scheduled break or lunch time
- 2) More than 10 minutes past the end of a shift
- 3) CA is observed having extreme difficulty processing the call
- 4) Call has been in progress more than 30 minutes with difficult call content or speed, or 60 minutes or more of an average call

The change of CA is handled through a supervisor who approves the change, finds an available CA to exchange, and issues the Call Take Over. When a change occurs, the new CA is identified to the Captioned Telephone user. Just prior to the change in CA a message is sent to the Captioned Telephone user indicating there will be a change in CA. After the change, a new message is sent with the new CA number indicating they have taken over the call. This way the client can choose to stop the standard phone user from talking for a moment until the new CA is fully in place. The change attempts to take place while the client is speaking so that the least amount of information to caption is lost.

## **Dialing 911 in an Emergency – Two-Line Captioned Telephone**

When calling 911 in emergency situations using 2-Line Captioned Telephone, one line is routed directly to the appropriate 911 center and the second line is routed through the captioning center. This allows the user to receive captions on one line and hear the conversation on the other line. The 911 center receives the caller's ANI information directly from the network in the same way as a non-Captioned Telephone call.

## **Dialing 911 in an Emergency – Single Line Captioned Telephone**

When calling 911 in emergency situations, the single line Captioned Telephone users' call is automatically routed to the appropriate 911 center because the call was placed from the user's home line. 911 calls are **not** routed through the captioning service. This means:

- There are no delays in accessing emergency personnel, as calls are directly connected to a 911 call center.
- Emergency 911 calls are **not** captioned in the same manner that regular Captioned Telephone calls are because the call is not routed through the CapTel Captioning Service.

- The Captioned Telephone user speaks directly into the handset, as with any other Captioned Telephone call. The 911 call-taker will hear everything the Captioned Telephone user says. The Captioned Telephone user is not able to hear the call taker, but the dispatcher can type instructions on a TTY, which will appear on the Captioned Telephone display screen.
- Emergency 911 Services will know the ANI of the caller and be able to locate the individual and send appropriate help, based on the location from which the Captioned Telephone call is placed.

### **Captioned Telephone Answer Performance**

Utah's Captioned Telephone answers 85% of calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in queue or on hold.

Utah's Captioned Telephone provider ensures that adequate staffing is supplied to provider Captioned Telephone users with an average answer speed of 85% of all calls answered within 10 seconds on a daily basis including abandons. As an experienced Captioned Telephone provider, Utah's Captioned Telephone provider communicates with CTI frequently to project future demand so all standards can be met.

Utah ensures that services standards relating to answer speed are met including during those times of increases or spikes in call volume. CTI tracks the number of CapTel phones distributed to users. Combining this with an average length of each call allows CTI to predict the number of Captioning Assistants that are needed. CTI provides adequate trunking capacity, CA workstations, personnel staffing, and equipment capacity to meet the current standard of 85% of all calls answered within 10 seconds on a daily basis. Abandoned calls are included in the speed of answer calculation. CTI also has reporting mechanisms and alarm systems to detect and record failures.

Utah ensures compliance with the P.01 customary TRS industry standard for blockage. Utah's Captioned Telephone provider commits to ensuring that no more than one call in 100 will receive a busy signal when calling the Captioning Center at the busiest hour.

### **Captioned Telephone Facilities**

Captioned Telephone Services are provided from several locations. CTI's CapTel Service Relay Centers located in Madison, WI and Milwaukee, WI. Utah's Captioned Telephone provider, Hamilton Relay, also processes Captioned Telephone calls from its own Call Centers located in Aurora, Nebraska; Baton Rouge, Louisiana; and Frostburg, Maryland.

Utah ensures that Captioned Telephone Service is available 24 hours per day, 7 days per week, and 365 days per year. CTI has the needed redundancy in switching mechanisms and telecommunications facilities to ensure operation 24 hours a day.

Each CapTel Center is equipped with redundant systems for power. The CapTel Centers utilize a combination of battery backup, commercial UPS supply, and/or auxiliary generator to supply uninterruptible power to the CapTel Center for extended periods of

time. Redundant systems for power include ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

The CapTel switching system includes a redundant Central Processing Unit (CPU) on “hot stand-by” to ensure that no calls are dropped due to processor failure, a full Maintenance and Administrative Terminal with keyboard, screen and printer capabilities, on-line monitoring, real time programming capabilities which does not take the system off-line, and an inventory of spare critical components which are maintained on site to ensure the required levels of service are met

It is also important to ensure that equipment and technology is tested and upgraded frequently. Hamilton and CTI communicate frequently and review plans to ensure redundancy, including: replacing servers with ones that have lower power requirements, allowing for longer power if back-up power is needed; deploying new servers which allow for more robust monitoring to see any signs of trouble before it would affect call processing; and deploying all servers and core switching gear are on a SONET fiber ring at each location.

### **True Caller ID via Captioned Telephone**

Utah’s Captioned Telephone provider offers FCC compliant Caller ID services. The FCC has required that when a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party. Utah’s Captioned Telephone provider has been providing True Caller ID which passes along the 10-digit number of the person calling since August 1, 2005.

The actual identity of the Calling Party is presented to the Called Party’s Caller ID box (True Caller ID). With True Caller ID, the Called Party may not know that they received a call via the Captioned Telephone service. Also if the Calling Party blocks their Caller ID, the Called Party does not receive any Caller ID information, functionally equivalent to a normal telephone call. Caller ID information of the Called Party is shown on the CapTel display screen.

### **Three-way Calling via Captioned Telephone**

Utah’s Captioned Telephone provider offers FCC compliant Three-way calling. A standard telephone user can initiate a three-way call to a Captioned Telephone user. For example, two standard phone users are on a call. The party with three-way calling feature on his/her phone line would hook flash to put the other person on hold, and would then dial the national Captioned Telephone voice number and give the CA the Captioned Telephone user’s telephone number or dial the Captioned Telephone user direct if a 2-Line Captioned Telephone user. All three parties would then be joined and the Captioned Telephone user would receive captions on the call.

With 2-Line Captioned Telephone, the Captioned Telephone user can initiate a Three-

way call in the same manner that a standard phone user would. The first line works exactly as a regular phone line (able to add another caller) and the second line supports the captions.

### **Call-Waiting via Captioned Telephone**

Call-waiting is supported by 2-line Captioned Telephone. When the Captioned Telephone user hears (or reads in the captions) the “beep” telling him/her a second call is coming in, the party would simply press the FLASH button on their CapTel phone. The Captioned Telephone user’s second caller will be on-line, and the Captioned Telephone user will receive captions of the conversation. The Captioned Telephone user will still receive captions of their first conversation, if/when they return to the first caller by pressing the FLASH button again.

No charges will be assessed to Captioned Telephone users for these local exchange non-basic services beyond what the user pays their LEC for these services.

### **Speed Dialing via Captioned Telephone**

Utah’s Captioned Telephone provider offers speed dialing, which is built into the CapTel phone’s Dialing Directory. To use this feature, the Captioned Telephone user saves the desired phone numbers in the CapTel memory. To speed dial a number in memory, the user simply presses the button next to the “Memory Dial/Redial” arrow. A list of saved numbers and the last number dialed is then displayed. The user then presses the button next to the number they wish to dial again and Captioned Telephone dials the number automatically.

### **711 via Captioned Telephone**

Utah’s Captioned Telephone provider has implemented a procedure for voice to Captioned Telephone that allows voice consumers to call a Captioned Telephone user by dialing 711 rather than the Captioned Telephone 800 number. Voice users can use this on a per-call basis or as an option on the Customer Profile.

### **Spanish Captioned Telephone**

Utah’s Captioned Telephone provider offers Intrastate and Interstate Spanish Language Captioned Telephone services. Spanish Captioned Telephone hours are from 7:00 a.m. to 11:00 p.m. Central Time. To use Spanish Captioned Telephone, the user selects the Spanish option under the menu settings. Once this setting is selected, calls will automatically route to a Spanish captioning CA. Voice users will dial the Spanish toll-free access number to call a Spanish Captioned Telephone user and have the call captioned in the Spanish language.

### **Using Automated (Touchtone) Systems via Captioned Telephone**

With Captioned Telephone, customers can easily receive and/or leave messages on answering machines or voice mail systems with automated menus.

The Captioned Telephone user can press the Captioned Telephone number buttons at any time during a call to make selections. This makes navigating automated systems easy.

The Captioned Telephone user can press a button as soon as they are ready to make a selection. The captioning service continuously transcribes what is heard regardless of what the Captioned Telephone user is saying or which buttons they press.

Some automated systems have very short response times which may disconnect the call. If this happens, the Captioned Telephone user will simply hang up and try the call again.

### **Leaving Messages on Answering Machines via Captioned Telephone**

The Captioned Telephone user may begin leaving their message as soon as they see “BEEP” on the display screen or hear the recorded greeting end.

If no further information is received, the Captioned Telephone user may assume their message was recorded. If the answering machine is capable of confirming that a message was left, the Captioned Telephone user will see the confirmation message on the Captioned Telephone display.

### **Retrieving Voice Mail Messages via Captioned Telephone**

The Captioned Telephone user simply calls into their voice mail/answering machine system as a remote caller, and follows the voice mail/answering machine prompts to retrieve the messages.

The Captioned Telephone user can press the number buttons at any time.

### **Captioning External Answering Machine Messages via Captioned Telephone**

Captioned Telephone users can receive captions of voice messages left on an answering machine that is near the CapTel phone by playing the messages aloud by following these instructions:

1. With the handset hung up, press the menu button until “Caption External Answering Machine Messages” is displayed.
2. Press the button next to “OK”.
3. Pick up the CapTel handset and place the handset mouth piece next to the answering machine speaker. Make sure the handset mouthpiece is close enough to “hear” the messages as they are played aloud.
4. In this mode, Captioned Telephone will automatically dial the captioning service. Watch the display to see when a connection is established.
5. Start playing the voice messages aloud on your external answering machine. Watch the CapTel display to see captions of the voice messages.
6. Save or delete voice messages directly on the answering machine. When you are finished, hang up the CapTel handset. The “Caption External answering Machine Messages” feature will go off automatically.

### **Captioned Telephone End User Billing**

Captioned Telephone users can utilize alternate billing arrangements; for example, collect, third number, person to person, calling card, credit card, and 900 number services.

Captioned Telephone users are not charged for use of the service. All local calls are provided free of charge to the consumer. All billing is performed by the customer's long distance carrier of choice. All billing information is routed to the customer's carrier during the outbound call setup. The carrier provides accurate billing to the customer using the same process used for regular non-Captioned Telephone calls.

All interstate calls, including out of state long distance and international calls are billed to the Interstate TRS Fund. Jurisdiction information is captured while the call is in progress and recorded in the CDR. This information is passed to the Captioned Telephone user's carrier of choice during the outbound call set-up for accurate billing to the Captioned Telephone user.

### **Captioned Telephone Carrier of Choice**

Utah's Captioned Telephone provider ensures that Captioned Telephone users will have the ability to access their chosen carrier of choice for intrastate or interstate interexchange carrier calls without regard to what CapTel phone they may call from to the same extent such access can typically be made by a TRS user (such as using 10-10-XXXX to access carrier of choice).

Utah's Captioned Telephone provider informs Captioned Telephone users of the need to designate a long distance carrier for long distance Captioned Telephone calls and the consequences of not making such a designation through a variety of methods including customer service, newsletters, the website, etc.

If a customer needs to make long distance calls with Captioned Telephone, they must register their existing long distance service or calling plan with Captioned Telephone Customer Service to ensure that any long distance charges are billed under their current long distance provider.

If they do not register a preferred long distance provider with Captioned Telephone, any long distance captioned calls they make will be automatically billed by Utah's TRS long distance carrier, at their long distance rate (which varies by state). There is no charge to customers for using the CapTel captioning service.

Customers can complete a Captioned Telephone Database Profile Request in order to specify their long distance carrier of choice. Customers can also designate their carrier of choice via the Captioned Telephone website or by calling Customer Service. Customers simply indicate which carrier they want to use.

Utah's Captioned Telephone provider has the ability to accurately determine call jurisdiction information in order to ensure that callers have access to extended community calling plans, optional calling plans and other special situations to the same extent provided by traditional relay service by delivering the call to the user's chosen IXC.

### **Directory Assistance via Captioned Telephone**

Utah's Captioned Telephone provider offers access to directory assistance to the same extent directory assistance is offered to Traditional TRS users. The Captioned Telephone user's carrier of choice bills for interlata and intralata directory assistance calls at their tariffed rate. All billing is performed by the customer's carrier. The call is then processed like all other Captioned Telephone calls.

(c)

*(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.*

The State of Utah is currently certified to provide intrastate TRS. The State of Utah is requesting certification beginning July 26, 2013, continuing for a five-year period.

*d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.*

Please refer to **Tab 7 Method of Funding** for a complete description of the State of Utah's funding mechanism.

(e)

*(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.*

The Relay Utah program has never been suspended or revoked and will continue to meet all FCC requirements necessary for certification.

(f) *Notification of substantive change.*

*(1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet Federal minimum standards after implementing the substantive change.*

Relay Utah understands and will notify the Commission of substantive changes in its TRS programs within 60 days of when they occur, and will certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

By this application the Utah Public Service Commission intends that the operation of Relay Utah will continue to be in compliance with the Federal Communication Commission rules and orders regarding telecommunications relay service. If there is any technical or substantial variation discovered by the Federal Communication Commission that would cause or could cause the Relay Utah to be out of compliance, the PSC agrees to take such action as may be reasonably required to bring Relay Utah into compliance.

*(d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.*

## **Method of Funding**

### **Utah Administrative Code**

#### **Rule R746-343-15. Surcharge.**

A. The surcharge will be imposed on each telephone number of each residential and business customer in this state.

B. The surcharge established by the Commission in accordance with Subsection 54-8b-10(4) is \$.06 per month for each residential and business telephone number, subject to the limitation on surcharges related to mobile telecommunication service specified in Utah Code Ann. Subsection 54-8b-10(4)(b)(ii).

C. Subject to Subsection R746-343-15(D), the telephone number surcharge will be collected by each telecommunications corporation providing public telecommunications service to the customer and submitted, less administrative cost, to the Public Service Commission on a quarterly basis.

D. The provider will submit its budget for annual review by the Public Service Commission.

E. The telephone surcharge need not be collected by a telecommunications corporation if the amount collected would be less than the actual administrative costs of that collection. In that case, the telecommunications corporation shall submit to the Commission, in lieu of the revenue from the surcharge collection, a breakdown of the anticipated costs and the expected revenue from the collection showing that the costs exceed the revenue.

## **Appendix A**

### **Standard Features**

Relay Utah provides the following features and services, which are listed in alphabetical order to ease the use in locating specific items.

#### **Alpha–Numeric Dialing**

If a relay user gives the CA an alpha-numeric number to dial (i.e. 1-800-HAMILTO), Relay Utah CAs automatically translate and dial the appropriate 10 digit number.

#### **Answering Machine Retrieval (Single-Line)**

Relay Utah provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the CA. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Communication Assistant by putting the handset near the speaker of the answering machine. The technology records any messages, enabling the Communication Assistant to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the caller disconnects, the recording is automatically erased.

Should Relay Utah have to redial to an answering machine, voice mail, interactive voice messaging unit or any other type of recording system, for whatever reason, Relay Utah does so without billing the customer for any subsequent long distance relay calls.

#### **ASCII Split Screen**

The relay platform used by Relay Utah’s provider is compatible with ASCII software that makes use of “split screens.” Relay Utah makes use of split screens for in which the CA’s typing is displayed in one window and the relay user’s typing is displayed in another window on the monitor of the CA workstation.

#### **Automated Call Routing**

During peak traffic periods, the switching equipment used by Relay Utah’s provider automatically routes calls to a workstation located in another of their relay centers to ensure the required levels of service are always met. If one of the switching systems is down for any reason, the calls will automatically overflow to another switching system.

#### **Automated Number Identification (ANI)**

ANI is the telephone number of the originating party. Relay Utah utilizes ANI technology on all of its incoming relay circuits. Relay Utah provider's switching equipment recognizes this information and presents it to the CA workstation. ANI is used to determine call jurisdiction.

### **Automatic Connection Mode**

The Automatic Connection Mode feature provides an automatic connection to the relay at the speed of the equipment used by the caller for all callers who have used Relay Utah's Services at least one time before. When the first time callers reach Utah's center, the "self-learning" database is updated with the caller's originating telephone number and the speed or call type at which the user connected to the center i.e. TTY, ASCII or Voice. After the first call, the center's equipment automatically connects at the correct speed whenever it is connected to that particular telephone number.

### **Average Speed of Answer**

Relay Utah's provider begins measuring Average Answer Time from the moment a relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as Relay Utah provider's equipment accepts the call from the LEC and the public switched network delivers the call to the TRS center, Relay Utah starts its call detail record process to capture answer time data. Relay Utah **answers** ninety (90%) of all relay calls within ten (10) seconds from the time the call enters the TRS system during all times of the day by any method which results in the caller's call immediately placed, not put in a queue or on hold. Abandoned calls are included in this daily answer performance calculation.

### **Background Noises**

Background noise is anything heard by the CA during a relay call which would normally be known to a hearing person. The TTY user is continually informed of what is going on throughout the call. Relay Utah puts this type of information in parentheses.

Relay Utah also provides tone of voice information when it has a significant impact on the content, context or intent of the relay call.

### **Carrier of Choice**

Relay Utah's customer profile database, based on the relay users' ANI, provides automatic connection to the carrier of choice (AT&T, Sprint, MCI, etc.) for both interlata and intralata calls made by the relay user in the same manner that voice users have access to preferred carriers.

### **Cellular/Wireless Access**

This feature allows relay users to access relay via cellular phones. Relay Utah's call processing for relay cellular calls ensures that relay users will not experience billing problems. Relay Utah automatically treats all wireless telephone calls that do not allow direct billing to the ANI as a local call. This prevents the wireless telephone user from having to make alternate billing arrangements.

### **CA Gender ID**

With this feature Relay Utah's macros automatically identify the CA's gender with the TTY greeting.

## **CA Gender Preferences**

Upon request, Relay Utah's Communication Assistants will switch a call to another Communication Assistant who is of the gender requested by the caller. That gender CA is retained for the user throughout the relay call. Customers can also profile their preferred gender and their call will automatically route to their preferred CA gender, if a CA of that gender is available.

## **CA in-call Replacement**

As a matter of practice, Relay Utah does not change Communication Assistants during a call. This exceeds the FCC rule that requires a CA to stay with the call for a minimum of 10 minutes or 15 minutes for STS calls. Even at the end of shifts, over lunch hours and other breaks, Relay Utah CAs stay with a call until it is completed. Relay Utah only substitutes a CA if obscenity is directed to the CA, a perceived conflict of interest exists or another major emergency exists. A change never takes place until either the calling or called party has completed their part of the conversation (typed or stated GA).

## **CA Typing Speed**

All of Relay Utah's Communication Assistants must type at least 60 words per minute. Relay Utah subtracts all errors to calculate typing speed. This ensures not only fast typists but also ACCURATE typists. The average typing speed of Relay Utah's Communication Assistants is 68.9 wpm with 98% accuracy.

## **Courtesy Messages**

Relay Utah supplies a courtesy message after three rings, to inform callers that they have reached Relay Utah. This courtesy message is transmitted in TTY and voice. Relay Utah's courtesy message follows: "You have reached the relay. Please hold for a CA." If the call has not been answered after 15 seconds, the message repeats as follows, "Please hold for a CA".

## **Customer Profile Database**

Relay Utah users may indicate how their calls are handled by including their calling preferences in their Customer Profile. This feature allows Relay Utah to customize the relay service for each relay user. Once activated, the customer profile appears on the CA's screen each time the relay user calls the relay so that the CA can properly process the call according to the user's preferences.

Relay Utah users do not have to use their preset preferences on every relay call. These preferences can be used at the discretion of the relay user on each relay call.

## **Customer Profile Security**

Customer profiles are based on ANI or a pre-established ten digit number. This provides a very high level of security and keeps all confidentiality practices intact. The customer

profile database can only be accessed internally (the database resides on site and is part of Relay Utah’s relay platform) and a password and PIN system is used to further secure the data. With this password, the relay user can request changes to the profile at any time.

### **Relay Utah Customer Profile Information:**

#### ***Customer Information***

<b>Profile Field</b>	<b>Information Purpose</b>
Name	First & Last Name: used for identification purposes.
Address	Street Address, City, State & ZIP Information used for further contact needs (account verification, service updates, etc.) and emergency services.
E-mail Address	Information used for further contacting client.
Phone Number	Used for profile identification when placing a call, as well as follow up.
Mailing List	Allows the user to choose to be included in the State Relay or Hamilton Relay mailing lists to receive newsletters and other important information regarding Telecommunications Relay Services.

#### ***Personalized Features***

<b>Profile Field</b>	<b>Information Purpose</b>
Profile Security	Password: Secret Word consisting of 4-10 letters and/or numbers. Choosing a Password ensures the Relay User is the only person who can make changes to their profile.
Multi-User Feature	PIN: Secret number 4 digits long. A PIN allows Relay user to have their own profile if more than one relay user living in their household.
Remote Profile Feature	PIN: Allows Relay user to access their customer profile when using the relay from any telephone or web-based computer, in any location.
Language Type	Allows User to select their preferred language. Options include English and Spanish.
Preferred Permanent Connection Mode	Call Handling Options: Allows Relay users to specify how they want their calls answered by the relay. Options include: TTY, VCO, HCO, ASCII, STS, Spanish, Telebraille and Voice.
Preferred CA Gender	Allows Relay users to specify the gender of the CA that the User prefers for each call.
Long Distance Company	Carrier of Choice: Allows Relay users to select their preferred long distance provider.

<b>Profile Field</b>	<b>Information Purpose</b>
Translator	When the translator option is selected, the CA will translate ASL to English and English to ASL for both the TTY user and the voice user unless given other instruction.
No Abbreviations	By choosing “No Abbreviations”, the CA will type word for word, without using abbreviations.
Slow Type Buffer	Hamilton’s slow type buffer will allow the CA to type at a normal pace while sending the text to the relay user at rates of text in increments of 5 words per minute. Hamilton CAs have the ability to turn this feature on or off on a per call basis.
Spell Check Turned Off	By turning spell check off, the Relay user will see mistakes or misspelled words. Spell check is turned on automatically.
Speed Dialing	Relay users may choose up to 50 numbers they would like programmed for speed dial. When a Relay user makes a call to a number on their speed dial list, they first connect to the CA and just tell the CA, “pls call Mom”.
Customizable Greetings	Allows Relay users to customize how the CAs identify relay to the person they are calling; for example, using their first name in the greeting. The profile also allows the relay user to choose to have the CA never explain relay or never identify the relay to any person called.
Restrictions	Allows the Relay user to select the types of calls to be blocked from their telephone including: long distance, 900, International, Directory assistance, toll-free and Operator assistance calls.
Background Noise	Allows the Relay user to choose whether or not to receive background noise information during their call.
Tone of Voice	Allows the Relay user to choose whether or not to receive voice descriptions.
Long Hold Times	When this feature is selected, the CA will continue to stay on hold but will not ask the Relay user repeatedly if they would like to continue the call.
User reads slowly	DBS user reads slowly so patience is required
CA speak slowly	Request that CA talk slowly to patience is required

Profile Field	Information Purpose
STS Contacts	STS Relay users can add contact information and hours of availability at each location so that a hearing user can ask for the STS user by name and be automatically connected with them in their registered location
STS Messages	Allows STS Relay users to dictate messages. CAs can save the message in the user's profile for up to 2 hours so that the STS user doesn't have to repeat the information.
Abbreviate Auto Message	This allows the CA to abbreviate messages when typing recordings or IVRs, allowing the User to receive a summarized recorded message.
Retain Information	This allows the retention of information from one inbound call for subsequent calls.
Open Line/Mute Transmission of STS User	This allows the User to communicate with the CA privately without the voice user hearing the conversation.
Specific instructions to STS CA	<ul style="list-style-type: none"> <li>• Before dialing, User prefers that the CA to asks: "Shall I tell the party who is calling?"</li> <li>• User prefers that CA confirm call handling preferences before dialing requested number</li> <li>• User prefers for callers to ask to call them by name rather than by telephone number.</li> </ul>
Standard message to leave on answering machine	This allows users to identify caller by name, request call back, specify call back number, and provide the relay telephone number.
Notes	Allows the Relay user to provide CAs with additional information they would like included or known for every call.

## **Guide**

<b>Profile Field</b>	<b>Information Purpose</b>
Guide for Understanding your Customer Profile	A guide is included to help the Relay user understand the purpose of each section or to better understand how to complete the profile to best meet their needs.

### **Transfer of Database Information**

Relay Utah's provider will transfer all customer profile database information to a new TRS provider at the termination of the contract. Relay Utah's provider will transfer this data in a usable format within 60 days prior to its last day of service.

### **Remote/Multi-User Profile Feature**

Relay Utah's Remote/Multi-User Profile allows relay users to access their profile from any phone or web-based computer, and through any type of relay service, whether traditional relay or Internet Relay.

Relay Utah users simply give their telephone number (or pre-established ten digit number) and PIN number to the CA, to permit the CA to view the customer's pre-selected preferences. This feature is of great benefit to customers who have more than one relay user living in the household. With Relay Utah's Remote/Multi-User Profile, each person can establish his/her own profile. Users who travel are always able to access their profile from anywhere.

### **Customer Service**

Relay Utah recognizes the importance of responsive customer care and places a large focus on responding to the needs of our customers. Relay Utah's Customer service department is very responsive to the needs of its customers and works to resolve all customer issues in a timely manner. Customer Service instructs relay users on how to place relay calls, answers questions about any changes that have been made, assists relay users with billing questions, performs equipment testing, provides a variety of referral numbers to state organizations and schedules one-on-one outreach visits for training purposes or larger outreach activities. Relay Utah's Customer Service is available 24 hours a day to ensure customers have constant access to customer support. Relay Utah has a separate toll-free number for Customer Service

### **Deaf/Blind Pacing/Slow Typing Requests/Slow Type Buffer**

Relay Utah's slow type buffer allows the CA to type at a normal pace while sending the text to the relay user at rates of text in increments of 5 words per minute. Relay Utah CAs have the ability to turn this feature on or off on a per call basis.

## **Dialed Number Verification**

Relay Utah verifies the number to be dialed by voicing it back to the voice user or typing it back to the TTY user (Relay Utah uses a hotkey to do this so there is no CA intervention). In the same hotkey, Relay Utah notifies the relay user if they are dialing a local number or toll number. The relay user will see “Dialing Toll (ATT) XXX-XXX-XXXX”. Both of these features ensure that the correct number is dialed and gives the relay user an opportunity to notify the CA if the carrier information is incorrect.

Relay Utah’s Communication Assistants verify all pertinent information, including the number to be dialed, names, proper names, account numbers and dollar amounts.

## **Directory Assistance**

This feature gives all relay users access to directory assistance services via the relay. Relay Utah processes directory assistance requests in the same manner as any other relay requests. Upon receiving the area code from the relay user, the CA dials the correct area code plus 555-1212. When reaching the directory assistance operator, the CA identifies herself/himself and asks for the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

The relay user can pick which carrier they want to use for directory assistance. The relay user’s carrier of choice will bill for directory assistance calls at their tariffed rate. With presubscription, the customer’s carrier performs all billing.

## **Emergency Assistance**

Relay Utah provides emergency assistance to all relay users. The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). Hamilton accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP: 1) through the use of Intrado’s 9-1-1 infrastructure and 2) through the PSAP database maintained by Hamilton.

## **Emergency Numbers**

Relay Utah users can add local emergency numbers to their speed dialing list on their Customer Profile. This feature can save valuable time when time is of the essence. A relay user could simply type call Fire or call 911 and the CA will automatically dial the appropriate PSAP. Relay Utah encourages all relay users to call 911 direct.

## **Enhanced Modems**

The modems used by Relay Utah’s provider can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly. These modems support ASCII connections and have faster ASCII detection capability (3 seconds).

## **Error Corrections/Abbreviation Expansion**

To increase typing speed and reduce conversation time, Relay Utah utilizes an Error Correction program which automatically checks words to be transmitted against our dictionary of commonly misspelled words. If a misspelled word is found, the Spell Checking software automatically corrects the word before it is sent to the TTY users. While the software automatically corrects any typographical errors of commonly misspelled words, proper nouns are not affected.

The spelling database is continually updated with new words as needed. Relay Utah users have seen the benefits as fewer typing errors are seen by the TTY user. This is one more way Relay Utah continues to bring quality service to its relay customers.

Relay Utah also offers a feature that allows CAs to use common abbreviations which are automatically expanded to the entire word in the transmitted text, which speeds up the transmission of the call.

Relay Utah users can specifically request to not use Spell Check or to not expand abbreviations via a customer profile.

## **Hearing Carryover (HCO)**

This feature allows people who have difficulty speaking to place and receive calls. The HCO caller hears the communication directly from their caller without such transmission being processed by the CA. The CA then voices any conversation typed by the HCO user to the other party.

Relay Utah allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of HCO call types are also available through Relay Utah.

## **HCO-HCO**

This service allows two HCO users to contact each other through the relay. Relay Utah provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation.

## **HCO Permanent Branding**

Relay Utah provides this service through its Customer Profile. Customers can choose to be automatically connected to HCO without any CA intervention at the workstation.

## **HCO-TTY and TTY-HCO**

This feature allows HCO users to contact TTY users (or vice versa) via the relay. The CA will voice the TTY user's typed conversation to the HCO user. The TTY user receives the HCO user's typed conversation directly from the HCO user.

## **HCO with Privacy**

Relay Utah provides HCO with Privacy upon the customer's request which gives privacy for the standard telephone user talking with an HCO user. The CA is not able to hear the hearing person's conversation, which goes directly to the speech disabled HCO user. The CA then voices any conversation typed by the HCO user to the other party.

## **Inbound International**

Relay Utah provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Relay Utah then places the outbound call to a destination in the United States free of charge and relays the conversation for them. Inbound International calls are billed to the Interstate TRS Fund.

## **Intercept Messages**

Relay Utah's system provides automated overflow to its other centers which in most instances eliminates the need for intercept messages. However, if the traffic cannot be rerouted for any reason such as multiple circuit failures, the callers will be notified with the appropriate type of intercept messages, which is transmitted in TTY and voice. Minutes of use attributed to accessing intercept messages are not included in the billable minutes.

## **Local Exchange Carrier (LEC) Calling Services**

Relay Utah's provider has made its relay service compatible with the network used by telephone companies to provide LEC calling services in a truly functionally equivalent manner. The relay user does not experience any additional costs except to the extent that a relay user is billed for enhanced services by the relay user's LEC (not the TRS provider) or that a three-way call results in two toll calls. Relay Utah does not charge the relay user for any special calling services.

- True Caller ID (SS7)  
Relay Utah's provide true Caller ID service through SS7 signaling where the actual information of the calling party (not the relay center number) appears on the Caller ID box. Relay Utah provides this information on all call types and on all carriers. Relay Utah passes, sends and receives calling line identification information, **including blocking information** from all users calling through the relay service.
- Caller ID (CID) Per Line (Global) Block/CID Per Call Block  
Calling line information is provisioned on the relay customer's line by the LEC. All forms of Caller ID Blocking (Global or per call blocking) pass through on a per call basis with no relay intervention. Because Relay Utah's provider makes use of true SS7 technology, rather than ISDN, all forms of calling line identification information and blocking features purchased by the LEC are passed through with no relay intervention. Because Relay Utah can pass, send and receive calling line identification information, a whole host of other features are available including:

- Call Screening (Call Rejection) (Call Block)  
Call Screening is provisioned on the relay customer's line by the LEC in order to prevent nuisance or unwanted calls. The relay user will simply program his/her phone to block all calls from his/her selected list of phone numbers. If someone calls through relay from one of these numbers on the list, the caller receives a pre-recorded announcement stating the caller is not accepting calls at this time, which the relay will type or voice to the originating caller. Calls from other numbers are not blocked.
- Call Acceptance  
Call Acceptance is provisioned on the relay customer's line by the LEC. Call Acceptance lets a relay user block all calls except those from his/her list of special phone numbers. A relay user can add, delete or change numbers on his/her list at any time. This feature is often used in order to prevent nuisance and solicitation calls. If someone calls through relay from a number not on the list, the caller receives a pre-recorded announcement stating the caller is not accepting calls at this time, which the relay will type or voice to the originating caller. Calls from numbers not on the list are blocked.
- Anonymous Call Rejection  
Anonymous Call Rejection is provisioned on the relay customer's line by the LEC in order to prevent receiving calls that are "blocked" or "private." Relay users who do not want to receive calls from parties who have blocked their Caller ID information can make use of this feature. Callers who have blocked their Caller ID information will receive a recording indicating that the called party is not accepting calls at this time which the Communication Assistant will either voice or type to the originating caller.
- Preferred Call Forwarding  
Preferred Call Forwarding is provisioned on the relay customer's line by the LEC. Relay users create a list of numbers that they wish to forward to a new telephone number. All other callers do not forward to the new telephone number. Relay users can add, delete or change numbers on their call forwarding list.
- Unique Flash  
Unique Flash is provisioned on the relay customer's line by the LEC. Relay users create a list of numbers with their own distinctive flash (ring). If someone calls through relay that is calling from a number with a distinctive flash associated with it, the called relay party will hear or see the distinctive flash. The unique flash indicates it's one of the special callers from the individual's list.

- Call Forwarding  
Preferred Call Forwarding is provisioned on the relay customer's line by the LEC. Relay Utah users create a list of numbers that they wish to forward to a new telephone number. All other callers do not forward to the new telephone number. Relay Utah users can add, delete or change numbers on their call forwarding list.
- Call Trace  
Because all of Relay Utah's network is based on SS7 connectivity, customers who have purchased Call Trace through their LEC can make use of Call Trace through relay, which works without relay intervention.
- Last Call Return  
Because Relay Utah provides true Caller ID service through SS7 signaling where the actual information of the calling party (not the relay center number) appears on the Caller ID box, the customer is able to see the telephone number of their last incoming call. To return the call, the customer simply calls relay and gives the CA the number on the Caller ID to call back. If the customer does not have Caller ID, Relay Utah provides last call return within the duration of the same inbound call.
- Three-Way Calling  
If a three-way call is desired and three-way calling is available from the LEC and the customer has purchased this feature from his/her LEC, the customer can use the feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.
- TRS Conference Calling  
In addition to three-way calling, Relay Utah also supports conference calling. The customer requests a relayed conference call and the text based relay user gives the number to dial and any access codes required to join the conference call.

### **Local/Extended Area Service**

The provider for Relay Utah has obtained the necessary information (NPA/NXX) from all Utah LECs to build a database to identify the difference between local, EAS and intrastate calls. This database notifies the CA if the call being placed is a local call (including areas of EAS). If it is a local call, no billing arrangements are necessary and the data is recorded to calculate session minutes only.

### **Machine Recording Capabilities**

The recording function allows the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informs the relay user through the use of a hot key on the CA's terminal that a recording has been reached, followed by another hot key stating (CA HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requests a department or live person, the CA types, “HLDING FOR DEPT/PERSON” and presses the appropriate option when the recording prompts.

If a caller requests listening to the complete message, the CA sends a hot key that states, “COLLECTING INFO PLS HLD” and the CA continues to collect the recording.

The message is retained for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system. Keys on the keyboard are used to control the speed of the recording ensuring the message is transmitted accurately by the CA. This makes the recording function very easy for Communication Assistants to use.

### **Pagers**

Relay Utah handles relay calls that involve pagers and beepers. There is no difference in Relay Utah’s call processing for text initiated calls made through pagers.

### **Regionally Directed Toll-Free Numbers**

Relay Utah allows access to regionally directed toll-free numbers. Because Relay Utah passes true Caller ID information, the caller’s ANI will reflect a Utah number which will result in the call being routed to the correct state or regional location.

### **Regionally Restricted Toll-Free Numbers**

Relay Utah's service allows access to restricted 800 numbers and other special prefixes.

### **Reverse Two-Line HCO**

Two-line HCO works in the reverse when a voice user places a call to a two-line HCO user through relay. It is then called Reverse Two-line HCO.

### **Reverse Two-Line VCO**

Two-line VCO works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

### **Spanish to Spanish Relay and Spanish to English Translation**

Relay Utah provides Spanish Relay services.

Relay Utah provides Interstate Spanish to Spanish, meeting the FCC requirement. Relay Utah's provider bills all Interstate minutes to the Interstate TRS Fund.

In addition, Relay Utah provides Intrastate Spanish to Spanish, Spanish to English and English to Spanish call handling.

The Utah Spanish 800 number is associated with a separate queue for Spanish 800 calls which are directed to a separate queue so that calls flow immediately to Spanish speaking CAs. If a relay user calls another 800 number, Relay Utah has the ability to transfer the call to a Spanish speaking CA. In addition, relay users can select “Spanish” as an option on Relay Utah’s Customer Profile. This information is presented to the CAs at the workstation for proper call processing.

CAs fluent in the Spanish language are scheduled for all shifts, 24 hours a day, seven days a week.

Relay Utah processes all the same call types on its Spanish lines as it does on its English voice and TTY lines, including TTY, VCO, HCO, ASCII, STS and 900 calls.

### **Speech Difficulty Indicator**

HCO users can indicate in the customized greeting section of their profile that they have difficulty speaking. For example, when an HCO user places a call to a TTY user, the CA will inform the TTY user that the caller has difficulty speaking. An indicator will appear in the Notes section of the CA workstation. CAs will uniformly recognize an “s” typed by a TTY user at the beginning of a call to indicate that the caller has difficulty speaking.

### **Speech to Speech (STS)**

Relay Utah's STS service allows individuals who have difficulty speaking to use his/her own voice or a speech synthesizer when using the relay. Specially trained CAs process Speech to Speech calls. Relay Utah gives STS users access to the same profile and all of the features contained within that profile which are currently available to other relay users.

### **Speech to Speech/Spanish**

Relay Utah’s STS service is also available in Spanish. Relay user’s can select “Spanish” and “STS” as an option on Relay Utah’s Customer Profile.

### **Speech to Speech/Voice Carry Over (VCO)**

STS/VCO is designed for people who are hard of hearing or Deaf and have difficulty speaking. The relay user can make or receive phone calls through the relay through a Speech to Speech CA using his/her own voice or voice synthesizer and read everything said by the voice caller on a TTY or VCO telephone.

### **STS to other TRS Communication Modes**

Relay Utah also allows STS users to place calls to people who use a TTY or other TRS communication modes such as VCO, HCO or to another person who has difficulty speaking. Speech to Speech can be used a variety of ways:

- Two hearing individuals, with the CA repeating the words of the person who has difficulty speaking.

- Two individuals who have difficulty speaking with the CA repeating both persons' words.
- A VCO user and a hearing person, with the CA repeating the words of the VCO user if the hearing person does not understand the user's speech and with the CA typing what is said by the hearing person to the VCO user.
- A TTY user and a person who has difficulty speaking without a TTY, with the CA typing the words of the person who has difficulty speaking to the TTY user.
- Hearing Carry Over with the person who has difficulty speaking typing what they would like to say and the Communication Assistant voicing it to the hearing user.
- Hearing Carry Over in combination with Speech to Speech.

### **Three-Way Calling**

In compliance with the FCC Order released on June 17, 2003, Relay Utah provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

### **Toll Discounts**

Relay Utah's Customer Service Representatives discuss carrier of choice with relay users and direct them to other telephone numbers to access more information from particular carriers. Relay Utah maintains a list of participating long distance carriers and telephone numbers and helps the customer shop for the best toll discounts through relay that match their calling style.

### **Transfer Gate Capabilities**

If a relay user calls 711 or the TTY relay access number and requests another service (such as STS, Spanish, etc.), Relay Utah has the ability to transfer the call to the appropriate workstation for call processing.

### **TTY to TTY (Call Release)**

Relay Utah processes TTY to TTY calls when it is necessary to go through a voice switchboard first or if the originating TTY user is using a calling card that is accessed by calling an 800 number first. Once the CA reaches a compatible TTY user when placing a relay call, Relay Utah gives the calling party the option to communicate independently of the relay function. If the calling party agrees to do so, the CA will drop out of the call. If the call is a long distance call, the call will be billed as a normal relay call (i.e. the relay user's carrier of choice).

Relay Utah provides a true call release function to satisfy the FCC requirement which removes the workstation from the call.

### **TTY to TTY (Call Release)**

Relay Utah processes TTY to TTY calls for Relay users, in which the CA remains on the line until both parties have disconnected.

### **Turbo Code**

Relay Utah provides Turbo Code which is a proprietary alternate protocol developed by Ultratec. This protocol is faster than Baudot (Turbo Code is similar to “real-time”) and does not have the limitation of ASCII. Turbo Code also allows for “interrupt” capability while one party is still typing. The modems used by Relay Utah auto-detect the end-user’s equipment for Turbo Code. If Turbo Code is found, Relay Utah automatically connects in “Turbo Code” to the relay user. Relay Utah users are able to automatically connect “Turbo Code” on every relay call type.

Relay Utah has an automatic identification of connection speed system within its relay platform. This feature provides automatic connection at the speed, including Turbo Code, of the equipment used by the caller for any caller who has used Utah’s Relay Services at least one time before. Our switch has a “self-learning” database which is updated the first time callers reach our center with their originating telephone number and the speed at which they connected to our center.

### **Two-Line HCO**

To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

### **Two-Line HCO/Speech to Speech**

This option works the same as a 2-Line HCO call but is processed by a specially trained STS CA. The 2-Line/STS user can choose between voicing their own conversation or having the CA voice the conversation for them. If the HCO user chooses to voice his/her conversation and becomes tired or is having difficulty being understood, he/she can type his/her part of the conversation and call on the CA to “re-voice” as needed. The HCO user can switch between voice and typing at any time during the call.

### **Two-Line VCO**

Two-line VCO capability allows a VCO user to have a more interactive conversation. By using two telephone lines the caller, if they have some hearing available, can listen to their conversation on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

### **Voice Carryover (VCO)**

Voice Carryover (VCO) provides people who can communicate with their voice but have difficulty hearing, the ability to place or receive calls. The VCO caller speaks his or her own message directly to the caller without such transmission being processed by the CA. The CA then types any conversation spoken to the VCO user so it can be read on the TTY. Relay Utah allows relay users to request VCO services without the normal TTY transmission that is typically required. A VCO user can connect voice and say "VCO" and Relay Utah connects the call. Voice users do not hear tones during a VCO call.

Relay Utah allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of VCO call types are also available through Relay Utah.

### **VCO-HCO and HCO-VCO**

Relay Utah provides this service to VCO and HCO users who call another HCO or VCO user through the relay. The VCO user voices his/her conversation directly to the HCO user. The HCO user's typing goes directly to the VCO user.

### **VCO Permanent Branding**

Relay Utah provides this service through its customer profile. Customers who always want to connect VCO are automatically connected to VCO without any CA intervention at the workstation.

### **VCO-TTY and TTY-VCO**

Relay Utah provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

In addition, Relay Utah provides VCO to TTY or ASCII services as well as all other combination of call types involving VCO.

### **VCO-VCO**

This service allows two VCO users to contact each other through the relay. Relay Utah provides VCO to VCO service where the CA types to both parties, saving the VCO users from having to type their part of the conversation.

## **VCO with Privacy**

Relay Utah provides VCO with Privacy upon request in which the CA will not hear the caller speaking through the relay and will only type voiced responses back to the VCO user.

## **Voice Gender ID**

Relay Utah's CAs indicate to the TTY user the gender of the non-TTY relay user at the beginning of the call – (M) Male, (F) Female or (Child) Child. If the CA is absolutely not sure, the CA will type (?).

Relay Utah's CAs also indicate to the TTY user when another voice person has become involved in the call. Relay Utah identifies the gender of the new party involved in the call immediately.

## **Voice to Voice Call Release**

Relay Utah provides Voice to Voice call release which allows a hearing user to connect to another hearing user via the Relay. This usually happens inadvertently. Rather than blocking the call, this feature allows the CA to be "released" from the telephone line without triggering a disconnection between two hearing users. The CA releases the call after the CA connects the originating hearing caller to the hearing called party.

## **1010 Numbers**

Relay Utah offers 1010 dialing through relay. This service is functionally equivalent to using 1010 services when not placing calls through relay.

## **7-1-1**

All services available from Relay Utah are accessible through 711 including Speech to Speech. Relay Utah meets all the same general requirements set forth for all relay calls when 711 is dialed rather than an 800 number.

## **Pay-Per-Call Services**

The relay platform used by Relay Utah's provider allows relay users to access intrastate and interstate 800, 900 and pay-per-call services in which the company providing the service bills the end-user directly. Relay Utah's provider has established the necessary trunking to the carriers participating in relay equal access so that the carrier can bill directly for this call.

A relay user calls the TTY relay number and gives the 800 or 900 number to the CA. The CA places the call as usual and begins relaying the call. On all 900 numbers, Relay Utah CAs type the dollar amount per minute associated with the call to the TTY user and asks him/her if he/she want to continue the call before charges begin. This is the point in which callers can disconnect without being charged. The calling party is billed for the call by the 900-service provider or the carrier, whichever is appropriate.

Because no 900 blocking information is automatically passed to Relay Utah's provider from the LEC, the provider relies on customer profile data as the only resource for this information. However, if a LEC were to contact the provider with this information, that resource would be used to block 900 access.

Customers who do not want 900 calls made from their telephone line through the relay, can complete a customer profile form. The customer profile contains an option that will block 900 calls made through the relay. This prevents anyone from calling a 900 number from that particular telephone line. If someone tries to call a 900 number through the relay from a line that has a block on it, the CA will receive notification at the workstation that this call is blocked and will not be able to place the call.

# How to make long distance work for you.

## **Step One - Determine your call patterns.**

Do you call long distance often?

If yes, where do you call? In-State? Out-of-State?

What time of day do you make these calls?

## **Step Two – Shop around.**

Call different long distance companies. Tell them your long distance calling patterns. They may have a calling plan that fits your calling patterns.

## **Step Three – Choose the best rate plan that fits your call patterns.**

Inform long distance carrier that you are a TTY/VCO user. Many long distance companies have TTY/VCO user discounts. Also tell them that you use the relay and want the same calling plan rates for your relay calls.

## **Step Four – Call your relay’s Customer Service Department and tell them which long distance company you prefer to use.**

Also tell Customer Service about any calling plans you have with your long distance company.

## **Step Five – Pay attention to rate changes.**

Long distance companies are competing for your business. Rates and calling plans are constantly changing. From time to time, check back with your long distance carrier, as well as others, to see if they have a better plan that can save you more money.

**\*\*NOTE: IF YOU DO NOT CALL YOUR CARRIER AND LET THEM KNOW YOU ARE THEIR CUSTOMER AND USE RELAY YOU WILL BE BILLED AT A HIGHER RATE.**

Listed below are the Long Distance Companies that are currently offered through the relay and their customer service numbers:

Relay Utah - Long Distance Carriers

**Utah** --(26)

AT&T	Excel	Moundridge Telecom
AT&T/SBC	Global Crossing	Pineland
BCN--Better Comm. Now	HTC Global Reach	Primus Telecom
Bresnan Communications	Interbel	Sprint
Century Link	LDCB	TNCI
Charter	Level 3/Broadwing	TTI National
Close Call	McGraw	VarTec Five Line
Coastal	MCI/WorldCom	Verizon
Comcast	McLeod USA	

# Important Information Regarding Relay Utah

**Relay Utah** is a public service which guarantees all citizens access to prompt, professional and accurate communication through the telephone. Consumers of these specialized services, specifically individuals who are deaf, deaf-blind, hard of hearing or have difficulty speaking, can communicate on the telephone via TTY/TDD, Voice Carry Over (VCO), Hearing Carry Over (HCO), Speech-to-Speech (STS), Spanish and Captioned Telephone in order to connect with family, friends or businesses with ease.

## Here's how Relay Utah works:

Dial 7-1-1 or the appropriate toll-free number provided to connect with Relay Utah. A qualified Communication Assistant (CA) will ask for the area code and number of the person you wish to call and will begin relaying the conversation. Generally, the CA will voice the typed message from the text telephone (TDD/TTY) user to the hearing person on the other end. The CA then relays the hearing person's spoken words by typing them back to the TDD/TTY user.

## Specialized Services:

Relay Utah offers specialized services for individuals who have difficulty speaking and for Spanish speaking residents which includes Spanish to English translation. Specially trained CA's are on hand to assist in these types of calls. Relay Utah offers a variety of services please refer to the website listed or call Relay Utah Customer Service for more details.

**Captioned Telephone** is also available and ideal for individuals with hearing loss who are able to speak for themselves. A captioned telephone works like any other telephone with an essential difference: it allows you to listen as well as read every word the other party says throughout the conversation on the display window. For more information regarding Captioned Telephone call the Relay Utah Customer Service at 1-888-269-7477 (V/TTY) or visit [www.RelayUtah.gov](http://www.RelayUtah.gov).

**Internet Relay** is also available. You can connect with a CA via your computer, web device or wireless device. To access this service, visit [www.hamiltonrelay.com](http://www.hamiltonrelay.com).

## Access to Services:

Both 7-1-1 and the 800 numbers are toll free calls and provide access to the same relay services. If you are experiencing trouble dialing 7-1-1 to reach Relay Utah, please call Relay Utah Customer Service.

All services are available 24 hours a day, seven days a week. Consumers may place relay calls to English and Spanish speaking persons within Utah, across the United States and even internationally. By law, each conversation is handled with strict confidentiality. There is no charge to access Relay Utah, although standard long distance charges apply.

## To place a call using Relay Utah, dial 7-1-1

or dial one of the toll free numbers below:

**TTY:** 1-800-346-4128

**Voice:** 1-888-735-5906

**VCO:** 1-800-346-7141

**Spanish:** 1-888-346-3162

**Speech-to-Speech:** 1-888-346-5822

## Customer Service Information:

1-877-831-4782 V/TTY

1-402-694-5110 Fax

P.O. Box 285

Aurora, NE 68818

Email: [relayutah@hamiltonrelay.com](mailto:relayutah@hamiltonrelay.com)

Web: [www.RelayUtah.gov](http://www.RelayUtah.gov)

## Captioned Telephone

### Customer Service:

1-888-269-7477

**To call a Captioned Telephone user, dial:**

7-1-1 or 1-877-243-2823

## Special points of interest:

### • Equipment Distribution Program

The Public Service Commission of Utah is a government agency that regulates utilities and offers specialized phone equipment to Utah customers who are deaf, deaf-blind, hard of hearing or have difficulty speaking. This program includes equipment lending or purchasing options for qualified applicants. For more information, visit [www.relayutah.gov](http://www.relayutah.gov) or call 801-530-6716 in the Salt Lake City area or toll free at 866-772-8824.

### • Emergency Calls

**Please note that 7-1-1 is only to be used to reach Utah Relay**

**In an EMERGENCY you should continue to use 9-1-1**

For emergencies, call 9-1-1 or your local emergency service TTY number directly, without using relay. The Americans with Disabilities Act (ADA) requires that 911 centers have a TTY and be prepared to handle emergency calls placed in this manner. Relay Utah will make every effort to assist you in an emergency. However, it is important to understand that relay centers are **not** 911 centers and do not assume responsibility for emergency calls.

## Outreach

The Public Service Commission is available to provide outreach in the form of presentations, educational workshops, training sessions, as well as distribute information to a variety of hearing, deaf, hard of hearing, and speech-disabled groups in Utah. In order to obtain information or schedule an outreach presentation, please contact the PSC toll-free at **1-866-772-8824** (V/TTY).

For more information about services and how to obtain equipment applications, please visit the Relay Utah website at [www.relayutah.gov](http://www.relayutah.gov) or call the Utah Public Service Commission at **(801) 530-6638** or at **1-866-772-8824** (toll-free).

## Spanish Relay

Llama al 711

## Speech to Speech

Call 711

## CapTel Relay Service

**1-877-243-2823** - Voice to CapTel



Relay Utah, Public Service Commission  
Heber M. Wells Building, 4th Floor  
160 East 300 South • Salt Lake City, UT 84111  
1-866-772-8824 • [www.relayutah.gov](http://www.relayutah.gov)



When every  
word is important





## Don't miss a single one

### Relay Utah – Your communication solution

Relay Utah began in 1989 as a telephone service allowing people with hearing and speech disabilities to make and receive telephone calls. This program is administered by the Utah Public Service Commission and funded by a nominal surcharge on telephone lines.

Today, Relay Utah assists residents who are deaf, deaf-blind, hard of hearing, and speech disabled to communicate with each other and the rest of the world. Through the program, specialized equipment is loaned to qualifying state residents at no cost. Relay Utah also provides interpreter “relay” services over the telephone, the Internet, by video, and on mobile devices through Hamilton Relay.

## Equipment and services for the hard of hearing

### Amplified Phones

- Adjustable volume and tone
- Eliminates background noise
- Large keypad buttons
- Hearing aid compatible
- Hands-free speakerphone
- Caller ID



### Captioning Telephones (CapTel®)

- Ideal for those who cannot hear on an amplified telephone
- Includes a display to read the caller's words
- Functions also as a traditional telephone
- Caller ID



### Two-Line CapTel Service

- Callers dial your phone number directly
- Eliminates the need for separate telephone numbers
- Speak and hear directly over one telephone line while reading captions on the second line

### Web CapTel Service

- No special equipment necessary
- Simply talk on the telephone while viewing the captions on a web browser:  
[www.hamiltonwebcaptel.com](http://www.hamiltonwebcaptel.com)  
[www.sprintcaptel.com](http://www.sprintcaptel.com)

### Wireless CapTel Service

- Wireless version of CapTel
- Listen to the caller on a wireless line (e.g. cellular phone) while reading the captions on a second line/device

### Mobile Devices

- Unlimited email, Internet access, and instant messaging
- Access to Internet Protocol (IP) Wireless Relay Service
- Data or Data/Voice Plans
- Wireless form of communication





## Equipment and services for the deaf

### Mobile Services

See previous panel (Mobile Devices for Hard of Hearing)

### Video Relay Service (VRS)

*Hamilton VRS – [www.hamiltonvrs.com](http://www.hamiltonvrs.com)*

*Sorenson VRS – [www.sorensonvrs.com](http://www.sorensonvrs.com)*

*Sprint VRS – [www.sprintvrs.com](http://www.sprintvrs.com)*

- Experienced video interpreters available 24/7
- Online help with live customer service
- Receive videomail messages
- No domestic long distance charges

### Internet Protocol Relay (IP Relay)

*Hamilton IP Relay – [www.hiprelay.com](http://www.hiprelay.com)*

*Sorenson IP Relay – [www.siprelay.com](http://www.siprelay.com)*

*Sprint IP Relay – [www.sprintip.com](http://www.sprintip.com)*

- Easy call set up
- Language preferences
- Customize background color, window size, and text options
- High-speed Internet access not required
- No domestic long distance charges

## Equipment and services for the speech disabled

- Speech to Speech
- Hearing Carry Over
- Hands-free speakerphones

**YES**, I would like a Relay Utah equipment application.

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Phone: \_\_\_\_\_

Best time to call:  a.m.  p.m.

Email: \_\_\_\_\_

I would like further information about:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

My preferred method of being contacted is:  
(check one)

By mail  By phone  By email





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PLACE  
STAMP  
HERE

RELAY UTAH  
UTAH PUBLIC SERVICE COMMISSION  
HEBER M WELLS BUILDING 4TH FLOOR  
160 EAST 300 SOUTH  
SALT LAKE CITY UT 84111

### **Utah Outreach Activities 2007**

<b>Date:</b>	<b>Activity</b>
17-Sep	Romney Plaza - Salt Lake Senior Affordable Housing
18-Sep	Peery House - Salt Lake Senior Affordable Housing
18-Sep	Mountainland Department of Aging and Family Services, Orem
19-Sep	City Plaza - Salt Lake City Senior Affordable Housing
24-Sep	Wasatch Manor - Salt Lake City Senior Affordable Housing
25-Sep	Salt Lake County Aging Services
26-Sep	Philips Plaza - Salt Lake City Senior Affordable Housing
October	Senior Expo
3-Oct	Springville Senior Center
12-Oct	Coventry Cove Apartments
15-Oct	Heritage Senior Center
16-Oct	St. Mark's Gardens
18-Oct	Provo Health and Wellness Extravaganza
23-Oct	Autumn Glow Senior Center
24-Oct	Brigham City Fair
12-Nov	Seville Independent Living Senior Housing Facility
30-Nov	South Town Ranch
3-Dec	Sandy Senior Center
4-Dec	Wasatch County Senior Citizen Center

### **Utah Outreach 2008**

<b>Date</b>	<b>Activity</b>
8-Feb	Thorneberry Atrium
13-Feb	Moroni Senior Center
19-Feb	Center for Independent Living
26-Feb	Wellington Senior Residence
25-Mar	Mountainland Continuum of Care Meeting
26-Mar	Minersville Senior Center
27-Mar	Milford Senior Center
28-Mar	Bear River Senior Companion Program Training Meeting
1-Apr	Moab Senior Center
2-Apr	Blanding Senior Center
3-Apr	Monticello Senior Center
15-Apr	Lincoln Tower Apartments
29-Apr	Capitol Villa Apartments
1-2-May	Bountiful Family Health and Wellness Fair
14-May	Legacy Village Apartments
29-May	Five County Senior Companion Program
4-Jun	Golden Years Senior Center
11-Jun	Adult Macular Degeneration Support Group
12-Jun	Beaver Senior Fair
18-Jun	Harmon Senior Center
20-Jun	Secure Horizons/Ever Clear
20-Jun	Foster Grandparent, Legacy, SLC Senior Companion Program Picnic
15-Jul	Uinta County Sight-Impaired Center
21-Jul	Golden Years Senior Center
13-Aug	Health Fair sponsored by United Healthcare at Sports Mall
18-Aug	Health Fair sponsored by United Healthcare at Family Total Health Club
20-Aug	Harmon Senior Center
9-Sep	Layton Hills Baptist Church

1-Oct	Brighton Gardens
6-Oct	Holladay Home for the Elderly
10-Oct	Senior Expo at South Towne
14-Oct	Adult Maculat Degeneration Support Group - Blanding
16-Oct	Senior Health and Wellness Extravaganza
22-Oct	Brigham City Health Fair
22-Oct	Uintah Basin AAA Senior Health Fair
5-Nov	Cottage Glen Assisted Living
6-Nov	Compass Villa Senior Housing
8-Nov	Association of the Deaf and Hard of Hearing
10-Nov	Jordan River Apartments
13-Nov	Highland Cove Retirement Park

#### **Utah Outreach Activities 2009**

<b>Date:</b>	<b>Activity</b>
14-Jan	National Active and Retired Federal Employees
26-Jan	St. Mark's Tower
4-Feb	Cache County Senior Citizens Center
18-Feb	Tremonton Senior Citizens Center
16-Mar	Tenth East Senior Center
23-Apr	East Carbon Senior Center
24-Apr	Karl Peterson Senior Center
12-May	Price Active Re-Entry Seminar
28-May	Liberty Senior Center - Project CARE Health & Resource Fair
2-Jul	Riverton Senior Center
5-Aug	Health Fair at Marman Senior Center
10-Aug	Huntington Senior Center
11-Aug	Castle Dale Senior Center
17-Aug	Ferron Senior Center
18-Aug	Green River Senior Center

#### **Utah Outreach Activities 2009-2010**

33 Senior Centers, Expos and Fairs - 3400 people reached

#### **Utah Outreach Activities 2010-2011**

66 Senior Centers, Expos and Fairs - 3500 people reached

#### **Utah Outreach Activities 2011**

<b>Date:</b>	<b>Activity</b>
5-Jan	Tremonton Senior Center 510 West 1000 North Tremonton
14-Jan	Field visit. Delivered CapTel to the Deaf and Hard of Hearing Center in St. George
20-Jan	Henrieville Senior Center 70 West Main St. Henrieville
21-Jan	Escalante Senior Center 89 North 100 East Escalante
25-Jan	Field visit. Delivered 2 amplified phones and 1 CapTel
26-Jan	Hurricane Senior Center 95 North 300 West Hurricane
26-Jan	Enterprise Senior Center 165 South 100 East Enterprise
27-Jan	Health Fair
28-Jan	Tooele Senior Center 59 East Vine Tooele
3-Feb	Taylorville Senior Center 4743 Plymouth View Dr
8-Feb	South Ogden Senior Center 580 39th Street, South Ogden
10-Feb	TV interview for Good Things Utah

16-Feb Wendover Senior Center 112 East Moriah Wendover  
 17-Feb Harman Senior Center 4090 South 3600 West Valley City  
 22-Feb Ogden Valley Nutrition Center 131 South 7400 East Huntsville  
 23-Feb Lake View Nutrition Center 5580 West 4600 South Hooper  
 24-Feb TV Interview KJAZZ Senior Spotlight  
 28-Feb Cheyenne Senior Center  
 1-Mar Sunday Anderson Westside Senior Center 868 West 900 South, Salt Lake City  
 2-Mar TV Interview KSL Studio 5  
 3-Mar Riverton Senior Center 12914 South Redwood Road Riverton  
 9-Mar South Towne Ranch 310 East 10600 South Sandy  
 10-Mar The Seville 325 West Center Street  
 24-Mar Harmony Home Health and Hospice Health Fair Escalante Apartments  
 24-Mar Fresh Living KUTV Interview  
 25-Mar Salt Lake County Health Fair 237 South 1000 East Salt Lake City  
 7-Apr Morgan Senior Center 50 West 100 North Morgan  
 11-Apr Union Gardens 468 3rd Street Ogden  
 12-Apr Golden Link Manor 1132 24th Street Ogden  
 21-Apr Golden Years Center 726 South 100 East Bountiful  
 30-Apr Sego Lily Legacy Bike Ride Event  
 2-May Parowan Senior Center 685 North 300 East Parowan  
 3-May Panguitch Senior Center 67 North 40 West Panguitch  
 4-May Cedar City Senior Center 489 East 200 South Cedar City  
 5-May Enterprise Senior Center 165 South 100 East Enterprise  
 6-May Hurricane Senior Center 95 North 300 West Hurricane  
 8-11-May National ADA Symposium Las Vegas  
 12-May Hamilton Scholarship Award to BreanaStokes  
 16-May Columbus Senior Center 2531 South 400 East Salt Lake  
 19-May TV Interview Fresh Living 299 South Main St SLC  
 20-May Harmony Home HealthFair 350 West Park St Midvale  
 25-May Liberty Senior Center Project CARE 251 East 700 South SLC  
 26-May Salt Lake County Aging Services Health Fair 251 East 700 South  
 2-4 Jun UAD Conference  
 4-Jun Marilyn Call Better Hearing and Speech Month Award  
 13-Jun Ability First Presentation, Provo  
 15-Jun The Harrison Regent, Ogden  
 17-Jun Foster Grandparent/Senior Companion Fair, Murray Park Pavilion  
 21-Jun Crossroads Senior Center, 50 East 200 South Roosevelt  
 22-Jun Hamilton Place, 764 South 800East Salt Lake  
 23-Jun West Jordan Senior Housing 2105 South Preston, Salt Lake  
 28-Jun Preston Place, Salt Lake  
 29-Jun Martha's Terrace, 2617 South 9040 West Magna  
 12-Jul East Carbon Senior Center 451 Denver Ave. East Carbon, UT  
 13-Jul Carbon Senior Activity Center 450 South Fairground Way Price  
 21-23-Jul EMS Conference New Mexico  
 6-Aug Sego Lily Legacy Bike Ride Event  
 10-Aug Happy Hours Nutrition 222 28th St, Ogden, UT  
 16-Aug Marriot-Slatersville Senior Center 1570 West 400 North Slatersville  
 17-Aug Golden Age Center 155 South 100 West Vernal UT  
 24-Aug Golden Hours Center 650 25th St. Ogden, UT  
 25-Aug Washington Terrace Center 4601 S 300 W Washington Terrace  
 29-Aug Training Seminar: Assertive Communication for Woman, Hampton Inn 307 N Admiral  
 Byrd Rd, Salt Lake City

31-Aug	Sandy Senior Center 9310 S 1300 East Sandy, UT
12-Sep	Meeting at Farr West Senior Center
14-Sep	Taylorsville Senior Center 4743 Plymouth View Dr
20-Sep	DAW Award to Jeff Agnello Davis High School
21-Sep	Plain City Nutrition Site 4160 West 2200 North Plain City
24-Sep	Deaf and HOH Festival Sanderson Center
26-Sep	Brighton Bank 93 West 3300 South
29-Sep	North View Senior Center 485 East 2550 North Ogden
29-30-Sep	Senior Expo South Towne Expo Center
4-Oct	North View Senior Center 485 East 2550 North Ogden
5-7 Oct	IMASH Conference Sheraton Hotel, Salt Lake City
8-Oct	Hamilton Annual Picnic, Washington City, UT
11-Oct	Multi Ethnic Senior Fair, Salt Lake City, UT
15-Oct	HAAA Walk 4 Hearing
17-Oct	Tenth East Senior Center, Salt Lake City
18-Oct	South Jordan Senior Center, Jordan, UT
20-Oct	Riverdale Senior Center, Riverdale
16-Nov	Meeting, RFB Brighton Bank 300 West 1700 South Salt Lake City
17-Nov	RFB Brighton Bank 940 West North Temple Salt Lake City
18-Nov	RFB Brighton Bank 311 South State Street Salt Lake City
22-Nov	RFB Brighton Bank 7101 Highland Drive Cottonwood
28-Nov	Multi Ethnic Senior Center 120 South 200 West Salt Lake City
6-Dec	RFB Brighton Bank South Salt Lake City (meeting)

### Utah Outreach Activities 2012

<b>Date:</b>	<b>Activity</b>
19-Jan	TV Interview, Studio 5
24-Jan	TV Interview Good Things, Utah
25-Jan	TV interview Fresh Living
15-Feb	PBS KUED TV Interview, Salt Lake City, UT
15-Mar	Presentation, Police Officer Standards Training, Salt Lake City, UT
26-Mar	Exhibition, Columbus Senior Health Fair, Salt Lake City, UT
29-Mar	CapTel Presentation, Hurrigan Senior Center, Hurrigan, UT
29-Mar	CapTel Presentation, St. George Lions Club, St. George, UT
30-Mar	CapTel Presentation, Enterprise Senior Center, Enterprise, UT
30-Mar	Dixie High Silent Weekend (ASL Event), St. George, UT
7-May	Booth, Harmony Homes Health Fair, Martha Terrace Facility, Salt Lake City, UT
8-May	Booth, Harmony Homes Health Fair, Hamilton Place, Salt Lake City, UT
9-May	Booth, Harmony Homes Health Fair, Merrill Apartments, Salt Lake City, Utah
15-May	Booth, Harmony Homes Health Fair, Preston Place, Salt Lake City
15-May	Presentation, Hamilton Scholarship Award, Salt Lake City, UT
16-May	Presentaiton, Hamilton Better Hearing and Speech Community Award, Salt Lake City, UT
17-May	Booth, Harmony Homes Health Fair, Plymouth View, Salt Lake City
21-May	Booth, Harmony Homes Health Fair, Glendale Senior Housing, Salt Lake City, UT
24-May	Booth, Harmony Homes Health Fair, West Jordan Senior Housing, West Jordan, UT
4-Jun	Penna Powers Brian Haynes Meeting
5-Jun	State Employees Meeting
14-Jun	Olive Osmond Hearing Fund Sponsorship
18-Jun	Penna Powers Brian Haynes meeting
16-Jun	Follow up sent to Client
11-Jul	Followup with Walk4Hearing
16-Jul	Penna Powers Brian Haynes meeting

18-Jul	Visit to Sego Lily Center
30-Jul	Penna Powers Brian Haynes meeting
31-Jul	Sanderson Center visit



## State of Utah

JON M. HUNTSMAN, JR.  
Governor

GARY HERBERT  
Lieutenant Governor

## Public Service Commission

TED BOYER  
*Chairman*

RIC CAMPBELL  
*Commissioner*

RON ALLEN  
*Commissioner*

**June 30, 2008**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-B204  
Washington, D.C. 20554

Re: TRS Consumer Complaints Log Summaries for the FCC, CG Docket 03-123

Dear Ms. Dortch:

In accordance with the Improved TRS Order issued in **CG Docket 03-123** by the Federal Communications Commission (FCC) and the order dated March 6, 2000, the Public Service Commission of Utah hereby submits the State of Utah's TRS Complaints Log. Included are summaries of reports from Sprint, Utah's TRS provider, as well as from Sorenson, a Video Relay Service provider.

For the period of June 1, 2007 through May 31, 2008, Sprint received a total of 6 (six) customer complaints for TRS and CapTel that were filed with supervisors at one of the Sprint TRS call centers. For the same period of time, Sorenson VRS received 23 (twenty-three) customer complaints. There were no complaints recorded for services such as IP Relay, Speech-to-Speech Relay, and Spanish Relay. Any complaints received by the Commission Secretary or the TRS Specialist with the Utah Public Service Commission were referred to the appropriate service provider and are included in their complaint records. All of the complaints were resolved in a timely fashion, and to the Utah PSC's knowledge, none of the aforementioned complaints escalated into action for the FCC.

The Utah Public Service Commission is currently working with a full-time Sprint Account Manager located and working in Utah which has proved beneficial. The Account Manager has assisted the Commission with implementation of a new wireless device program for expansion of usage of IP Wireless Relay Services.

The Commission has been working with an advertising and public relations firm in order to assist with outreach efforts. Updates are underway to the website ([www.relayutah.gov](http://www.relayutah.gov)) in order to make it more user-friendly. The advertising firm will continue to assist with endeavors such as public service announcements regarding equipment and services such as the Captioned Telephone and wireless devices.

The Utah Public Service Commission continues to work in conjunction with the FCC as well as strives to be proactive to providing the best possible relay service for the residents of Utah.

Sincerely,

/s/ Julie Orchard  
Commission Secretary  
TRS Administrator  
160 East 300 South  
Salt Lake City, UT 84111  
(801) 530-6713 (V)  
(801) 530-6796 (fax)  
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Attachment #1: Complaint Log Summary for Period of June 1, 2007 – May 31, 2008

Attachment #2: Summary of Complaints for Period of June 1, 2007 – May 31, 2008

Attachment #3: Annual Tally Report for Period of June 1, 2007 – May 31, 2008

cc: Arlene Alexander  
Federal Communications Commission  
Consumer & Governmental Affairs Bureau  
445 12<sup>th</sup> Street, S.W. Rm. 3-C408  
Washington, D.C. 20554

**Attachment #1**  
**Utah Public Service Commission - Complaint Log Summary**  
**June 1, 2007 – May 31, 2008**

**Sprint - TRS and CapTel Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Explanation of Resolution</b>
06/26/07	Billing – General	06/26/07	Discussed the need to register long distance carrier of choice with caller and registered preferred carrier accordingly.
09/17/07	Captions lag too far behind voice	09/17/07	Customer expressed desire for more simultaneous captioning with no lag time behind the speaker. Customer service researched case and found lag time about 10 seconds more than norm. Customer service representative apologized for this incidence and thanked customer for the feedback. The Agent involved will be monitored and provided tips on avoiding any additional seconds of delay.
05/01/08	Set up - General	3/5/07	Assisted program representative with troubleshooting tips as multiple devices are on the line causing CapTel phone to only ring once on incoming calls.
05/28/08	Set up - General	05/28/08	Discussed the proper way to set up 2 line CapTel with the first phone line in the first jack of the CapTel phone and the second line in the second jack of the CapTel phone.
05/28/08	Set up - General	3/5/07	Advised using y jack when wanting to use CapTel and another device on the same wall jack. This resolved customer's experience.
05/30/08	Customer was not happy about all relays are typing terribly. None of the words come out right. :It makes me crazy!"	05/30/08	Supervisor spoke with the customer. She explained that the Agent was typing correctly, however, there was probably garbling on the TTY. Customer was happy with explanation and said would hang up to try another Agent. Non agent error. Agent has followed procedure by disabling turbo code, slowing typing down. No action taken.

**Attachment #1 (continued)**  
**Utah Public Service Commission – Complaint Log Summary**  
**June 1, 2007 – May 31, 2008**

**VRS Complaints – Sorenson Communications**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Explanation of Resolution</b>
6/11/07	Poor Video Interpreter (VI) etiquette.	6/13/07	Manager: Interpreter retrained.
6/15/07	Poor VI quality.	7/18/07	Manager: Interpreter retrained.
7/23/07	Poor VI etiquette on VCO call.	8/9/07	Manager: Interpreter retrained.
7/23/07	Poor VI etiquette on VCO call.	7/24/07	No interpreter number was provided with the complaint so no retraining could be completed. Forwarded to national trainer to be reviewed in the training.
8/1/07	Poor VI quality.	10/17/07	Manager: Interpreter retrained.
8/23/07	Poor VI quality.	8/29/07	Manager: Interpreter retrained.
9/12/07	Poor VI quality.	12/13/07	Manager: Interpreter retrained.
9/13/07	Poor VI quality.	10/15/07	Manager: Interpreter retrained.
1/2/08	Poor VI etiquette.	1/7/08	Manager: Interpreter retrained.
1/17/08	Poor VI quality.	1/25/08	Manager: Interpreter retrained.
1/28/08	Poor VI quality.	1/29/08	Manager: Interpreter retrained.
1/29/08	Poor VI etiquette.	1/29/08	Manager: Interpreter retrained.
2/4/08	Poor VI etiquette.	2/8/08	Manager: Interpreter retrained.
2/11/08	Poor VI quality.	2/12/08	Manager: Interpreter retrained.
2/19/08	Poor VI etiquette.	2/21/08	Manager: Interpreter retrained.
2/21/08	Poor VI quality.	2/27/08	Manager: Interpreter retrained.
2/28/08	Poor VI etiquette.	2/28/08	Manager: Interpreter retrained.
3/5/08	Hold times	3/5/08	Customer Service: Apologized for the hold time the caller experienced.
3/24/08	Poor VI quality.	5/30/08	Manager: Interpreter retrained.
3/27/08	Poor VI etiquette.	3/27/08	No Interpreter number provided with the complaint.
3/31/08	Poor VI quality.	4/3/08	Manager: Interpreter retrained.
4/18/08	Poor VI etiquette.	6/23/08	Manager: Interpreter retrained.
4/28/08	Poor VI etiquette.	6/3/2008	Manager: Interpreter retrained.

**Attachment #2**  
**Utah Public Service Commission – Summary of Complaints**  
**June 1, 2007 – May 31, 2008**

For the period of June 1, 2007 through May 31, 2008, there were a total of 29 (twenty-nine) complaints filed with Sprint and Sorenson for TRS, VRS, and CapTel. No complaints were filed for any of the other services e.g. Speech-to-Speech, IPRelay, Spanish Relay, etc. Sprint received a total of 6 (six) customer complaints and all complaints were filed with supervisors at one of the Sprint TRS or Captioning centers. Sorenson Communications reports receiving a total of 23 complaints in the period of June 1, 2007 through May 31, 2008 of all calls originating or terminating in the State of Utah. All 29 (twenty-nine) complaints were resolved in a timely fashion, and none were escalated for action by the State of Utah or by the Federal Communications Commission.

**Attachment #3**  
**Utah Public Service Commission - Annual Tally Report**  
**June 1, 2007 - May 31, 2008**

**TRS/CapTel Customer Complaints**

<b>Type of Complaint</b>	<b>Number of Complaints</b>
Billing - General	1
Captions lagging behind voice	1
Set up - General	3
Garble	1

**Total = 6 complaints**

**VRS Customer Complaints**

<b>Type of Complaint</b>	<b>Number of complaints</b>
Video Interpreter (VI) Quality	11
VI Etiquette	11
Hold Times	1

**Total = 23 complaints**

**Attachment #3 (continued)**  
**Relay Utah - Annual Tally Report by Month**  
**June 1, 2007 - May 31, 2008**

<b>TRS/CapTel Tally</b>	<b>Number of Complaints</b>
June 2007	1
July 2007	0
August 2007	0
September 2007	1
October 2007	0
November 2007	0
December 2007	0
January 2008	0
February 2008	0
March 2008	0
April 2008	0
May 2008	4
<b>Total TRS Complaints</b>	<b>6</b>

<b>VRS Tally</b>	<b>Number of Complaints</b>
June 2007	2
July 2007	2
August 2007	2
September 2007	2
October 2007	0
November 2007	0
December 2007	0
January 2008	4
February 2008	5
March 2008	4
April 2008	2
May 2008	0
<b>Total VRS Complaints</b>	<b>23</b>



## State of Utah

JON M. HUNTSMAN, JR.  
Governor

GARY HERBERT  
Lieutenant Governor

## Public Service Commission

TED BOYER  
Chairman

RIC CAMPBELL  
Commissioner

RON ALLEN  
Commissioner

**June 30, 2009**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-B204  
Washington, D.C. 20554

Re: TRS Consumer Complaints Log Summaries for the FCC, CG Docket 03-123

Dear Ms. Dortch:

In accordance with the Improved TRS Order issued in **CG Docket 03-123** by the Federal Communications Commission (FCC) and the order dated March 6, 2000, the Public Service Commission of Utah hereby submits the State of Utah's TRS Complaints Log. Included are summaries of reports from Sprint, Utah's TRS provider, as well as from Sorenson, a Video Relay Service (VRS) and Internet Protocol (IP) Relay provider.

For the period of June 1, 2008 through May 31, 2009, Sprint received 1 (one) customer complaint for Speech to Speech and 8 (eight) for CapTel that were filed with supervisors at one of the Sprint call centers for a total of 9 (nine) overall complaints. For the same period of time, Sorenson VRS received 25 (twenty-five) customer complaints. There were no complaints recorded for services such as TRS and Spanish Relay. According to Sorenson Communications, "Sorenson is unable to determine where IP Relay calls originate and therefore cannot provide a log of complaints regarding IP relay service originating in the state of Utah. Any complaints received by the Commission Secretary and/or the TRS Specialist with the Utah Public Service Commission were referred to the appropriate service provider and are included in their complaint records. All of the complaints were resolved in a timely fashion, and to the Utah PSC's knowledge, none of the aforementioned complaints escalated into action for the FCC.

The Utah Public Service Commission is currently collaborating with Sprint to provide training on mobile devices in order to better utilize the IP Wireless Relay Services. Utah's TRS Specialist distributes approximately 10 new CapTel phones each month and provides in-depth training to each and every customer.

The Commission continues to work with an advertising and public relations firm in order to assist with outreach efforts. Commercials, advertisements, and a continually updated website for Relay Utah services and the equipment distribution program have kept the Public Service Commission staff busy. The advertising firm will continue to assist with these endeavors such as public service announcements for equipment and services such as the Captioned Telephone and wireless devices.

The Utah Public Service Commission continues to work in conjunction with the FCC and strives to be proactive towards providing the best possible relay service for the residents of the State of Utah.

Sincerely,

/s/ Julie Orchard  
Commission Secretary  
TRS Administrator  
160 East 300 South  
Salt Lake City, UT 84111  
(801) 530-6713 (V)  
(801) 530-6796 (fax)  
[jorchard@utah.gov](mailto:jorchard@utah.gov)

Attachment #1: Complaint Log Summary for Period of June 1, 2008 – May 31, 2009

Attachment #2: Summary of Complaints for Period of June 1, 2008 – May 31, 2009

Attachment #3: Annual Tally Report for Period of June 1, 2008 – May 31, 2009

cc: Arlene Alexander  
Federal Communications Commission  
Consumer & Governmental Affairs Bureau  
445 12<sup>th</sup> Street, S.W. Rm. 3-C408  
Washington, D.C. 20554

**Attachment #1**  
**Utah Public Service Commission - Complaint Log Summary**  
**June 1, 2008 – May 31, 2009**

**Sprint - TRS and CapTel Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Explanation of Resolution</b>
06/12/08	Technical – General	06/12/08	Long distance network problem identified where calls were routed through an incompatible network using VOIP lines causing data connection difficulties. Problem resolved by technical support by routing calls through an alternate network. Confirmed with customer this remedied the circumstance.
06/13/08	Technical – General	06/13/08	Long distance network problem identified where calls were routed through an incompatible network using VOIP lines causing data connection difficulties. Problem resolved by technical support by routing calls through an alternate network. Confirmed with customer this remedied the circumstance.
06/13/08	Technical - General	06/13/08	Long distance network problem identified where calls were routed through an incompatible network using VOIP lines causing data connection difficulties. Problem resolved by technical support by routing calls through an alternate network. Confirmed with customer this remedied the circumstance.
08/18/08	Technical – Speech to speech customer has problem using his cell phone through relay. He can reach a relay operator but is unable to dial a number through relay. Advised caller of referral to technical department. Follow-up requested.	11/26/08	Spoke with customer to obtain more information. Engineering duplicated the problem. Relay Program Manager left messages to the customer. RPM closed the ticket.
09/03/08	Consumer Education	09/03/08	Advised customer that callers to a 2-line CapTel USB phone would dial directly and that captions would appear on computer screen in adjustable font.
10/22/08	Billing - General	10/22/08	Referred customer to Sprint Relay provider for review of long distance charges billed by the default carrier prior to registering.
01/12/09	Dialing issue – unable to dial regional 800 number	01/12/09	Technical Support changed outbound calling number in CapTel system to enable outbound captioned calling.

03/06/09	Consumer education – USB	03/06/09	Advised customer to make sure that CapTel is hung up before trying to open the CapTel USB software. Customer confirmed this resolved the set up.
03/19/09	Disconnect/Reconnect during calls	03/19/09	Sent customer information explaining the difference between a CapTel and a traditional phone. Explained to customer why disconnection/reconnection might occur and sent email with tips to reduce the occurrence.

**Attachment #1 (continued)**  
**Utah Public Service Commission – Complaint Log Summary**  
**June 1, 2008 – May 31, 2009**

**Sorenson Communications – VRS Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Explanation of Resolution</b>
6/10/08	Poor Video Interpreter (VI) quality.	6/10/08	No interpreter number provided with the complaint so no retraining could be completed.
6/25/08	VI receptive skills inadequate.	6/25/08	Customer Service: Responded to the customer.
7/07/08	Poor VI etiquette.	07/09/08	Manager: Interpreter retrained.
7/15/08	VI receptive skills inadequate.	7/15/08	Manager: Interpreter retrained.
9/04/08	VI receptive skills inadequate.	9/09/08	Manager: Interpreter retrained.
9/16/08	Poor VI etiquette.	9/18/08	Manager: Interpreter retrained.
9/22/08	Poor VI etiquette.	11/11/08	Manager: Interpreter retrained.
10/16/08	Poor VI etiquette.	11/11/08	Manager: Interpreter retrained.
10/31/08	VI signing/fingerspelling was unclear.	12/05/08	Manager: Interpreter retrained.
11/12/08	VI skills inadequate.	11/13/08	Manager: Interpreter retrained.
11/20/08	VI receptive skills inadequate.	11/20/08	Manager: Interpreter retrained.
12/01/08	Poor VI etiquette.	2/13/09	Manager: Interpreter retrained.
12/03/08	VI receptive skills inadequate.	12/3/08	Manager: Interpreter retrained.
12/16/08	Poor VI etiquette.	12/18/08	Manager: Interpreter retrained.
1/12/09	Poor VI quality.	2/05/09	Manager: Interpreter retrained.
1/13/09	Poor VI quality.	1/15/09	Wrong interpreter number.
1/16/09	Poor VI etiquette.	1/20/09	Manager: Interpreter retrained.
2/04/09	Poor VI etiquette.	2/04/09	Manager: Interpreter retrained.
2/07/09	Poor VI etiquette.	2/11/09	Manager: Interpreter retrained.
3/30/09	Poor VI etiquette.	3/31/09	Manager: Interpreter retrained.
4/08/09	VI receptive skills inadequate.	4/20/09	Manager: Interpreter retrained.
4/23/09	VI failed to relay conversation verbatim.	5/05/09	Manager: Interpreter retrained.
4/27/09	Poor VI etiquette.	4/29/09	Manager: Interpreter retrained.
5/07/09	Poor VI etiquette.	6/05/09	Director called and apologized to the customer.
5/11/09	VI receptive skills inadequate.	5/11/09	Manager: Interpreter retrained.

**Attachment #2**  
**Utah Public Service Commission – Summary of Complaints**  
**June 1, 2008 – May 31, 2009**

For the period of June 1, 2008 through May 31, 2009, there were a total of 34 (thirty-four) complaints filed with Sprint and Sorenson for Speech to Speech, VRS, and CapTel. No complaints were filed for any of the other services e.g. TRS, Spanish Relay, etc. Sprint received a total of 9 (nine) customer complaints and all complaints were filed with supervisors at one of the Sprint TRS or Captioning centers. Sorenson Communications reports receiving a total of 25 (twenty-five) complaints for this same period for all calls originating or terminating in the State of Utah. All 34 (thirty-four) complaints were resolved in a timely fashion, and none were escalated for action by the State of Utah or by the Federal Communications Commission.

**Attachment #3**  
**Utah Public Service Commission - Annual Tally Report**  
**June 1, 2008 - May 31, 2009**

**TRS/CapTel Customer Complaints**

<b>Type of Complaint</b>	<b>Number of Complaints</b>
Billing - General	1
Technical - General	3
Speech to Speech	1
Disconnect/Reconnect	1
Dialing 800 number	1
Consumer Education – USB	2

**Total = 9 complaints**

**VRS Customer Complaints**

<b>Type of Complaint</b>	<b>Number of complaints</b>
Video Interpreter (VI) Quality	3
VI Etiquette	12
VI signing/fingerspelling unclear	1
VI failed to relay conversation verbatim	1
VI receptive skills inadequate	8

**Total = 25 complaints**

**Attachment #3 (continued)**  
**Relay Utah - Annual Tally Report by Month**  
**June 1, 2008 - May 31, 2009**

<b>TRS/CapTel Tally</b>	<b>Number of Complaints</b>
June 2008	3
July 2008	0
August 2008	1
September 2008	1
October 2008	1
November 2008	0
December 2008	0
January 2009	1
February 2009	0
March 2009	2
April 2009	0
May 2009	0
<b>Total TRS Complaints</b>	<b>9</b>

<b>VRS Tally</b>	<b>Number of Complaints</b>
June 2008	2
July 2008	2
August 2008	0
September 2008	3
October 2008	2
November 2008	2
December 2008	3
January 2009	3
February 2009	2
March 2009	1
April 2009	3
May 2009	2
<b>Total VRS Complaints</b>	<b>25</b>

**June 30, 2010**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-B204  
Washington, D.C. 20554

Re: TRS Consumer Complaints Log Summaries for the FCC, CG Docket 03-123

Dear Ms. Dortch:

In accordance with the Improved TRS Order issued in **CG Docket 03-123** by the Federal Communications Commission (FCC) and the order dated March 6, 2000, the Public Service Commission of Utah hereby submits the State of Utah's TRS Complaints Log. Included are summaries of reports from Sprint and Hamilton Relay, Utah's TRS providers for the past year, as well as from Sorenson, a Video Relay Service (VRS) and Internet Protocol (IP) Relay provider.

For the period of June 1, 2009 through May 31, 2010, the State of Utah submits the following complaints/commendations record. Sprint was Utah's TRS and CapTel provider until January 28<sup>th</sup>, 2010 when Hamilton Relay took over the contract. Sprint received 3 (three) customer complaint for TRS and CapTel that were filed with supervisors at one of the Sprint call centers. Hamilton Relay became the provider, and then there were 20 (twenty) complaints for TRS and for CapTel. For the entire year, Sorenson VRS received 45 (forty-five) customer complaints. There were no complaints recorded for services such as Speech to Speech or Spanish Relay. All three vendor complaint records add up to a total of 68 (sixty-eight) complaints for the required time period. According to Sorenson Communications, "Sorenson is unable to determine where IP Relay calls originate and therefore cannot provide a log of complaints regarding IP relay service originating in the state of Utah." Any complaints received by the Commission Secretary and/or the TRS Specialist with the Utah Public Service Commission for all services were referred to the appropriate service provider and are included in their complaint records. All of the complaints were resolved in a timely fashion, and to the Utah PSC's knowledge, none of the aforementioned complaints escalated into action for the FCC.

The Utah Public Service Commission is currently collaborating with Sprint to provide training on mobile devices in order to better utilize the IP Wireless Relay Services. Utah's TRS Specialist distributes approximately 10 new CapTel phones each month and provides in-depth training to each and every customer.

The Commission continues to work with an advertising and public relations firm in order to assist with outreach efforts. Commercials, advertisements, and a continually updated website for Relay Utah services and the equipment distribution program have kept the Public Service Commission staff busy. The advertising firm will continue to assist with these endeavors such as public service announcements for equipment and services such as the Captioned Telephone and wireless devices.

The Utah Public Service Commission continues to work in conjunction with the FCC and strives to be proactive towards providing the best possible relay service for the residents of the State of Utah.

Sincerely,

/s/ Julie Orchard  
Commission Secretary  
TRS Administrator  
160 East 300 South  
Salt Lake City, UT 84111  
(801) 530-6713 (V)  
(801) 530-6796 (fax)  
[jorchard@utah.gov](mailto:jorchard@utah.gov)

Attachment #1: Complaint Log Summary for Period of June 1, 2009 – May 31, 2010

Attachment #2: Summary of Complaints for Period of June 1, 2009 – May 31, 2010

Attachment #3: Annual Tally Report for Period of June 1, 2009 – May 31, 2010

cc: Arlene Alexander  
Federal Communications Commission  
Consumer & Governmental Affairs Bureau  
445 12<sup>th</sup> Street, S.W. Rm. 3-C408  
Washington, D.C. 20554

**Attachment #1**  
**Utah Public Service Commission - Complaint Log Summary**  
**June 1, 2009 – January 27, 2010**

**Sprint - TRS and CapTel Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Explanation of Resolution</b>
06/18/09	Technical – General	06/23/09	Long distance network problem identified where calls were routed through an incompatible network using VOIP lines causing data connection difficulties. Problem resolved by technical support by routing calls through an alternate network. Confirmed with customer this remedied the circumstance.
07/17/09	Technical – General	07/17/09	Long distance network problem identified where calls were routed through an incompatible network using VOIP lines causing data connection difficulties. Problem resolved by technical support by routing calls through an alternate network. Confirmed with customer this remedied the circumstance.
08/24/09	Technical - General	08/24/09	Long distance network problem identified where calls were routed through an incompatible network using VOIP lines causing data connection difficulties. Problem resolved by technical support by routing calls through an alternate network. Confirmed with customer this remedied the circumstance.

**Attachment #1**  
**Utah Public Service Commission - Complaint Log Summary**  
**January 28 – May 31, 2010**

**Hamilton Relay - TRS and CapTel Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Resolution of Complaint</b>
1/29/2010	Caller stated that her father is unable to place a VCO call when dialing 7-1-1. Caller stated that the relay CA's were not setting up VCO. Customer wanted to update profile to reflect no abbreviations.	1/29/2010	Customer Service verified that the profile information was set up correctly. Customer Service forwarded information to the technical department. The technical department discovered an issue with the profile and updated it. Test calls were placed successfully. Customer was satisfied.
2/1/2010	Utah PSC TRS Specialist contacted relay on behalf of an HCO customer stating that calls are connecting VCO instead of HCO. Customer also requested a home visit to check equipment.	2/2/2010	Lead CA forwarded the information to the technical department. Technical department verified the customer's profile with previous provider was not received. Profile was set for customer and customer was notified of change.
2/2/2010	Customer stated that calls through the relay have been connecting incorrectly since the change in providers.	2/2/2010	Assistant Operations Manager apologized and discovered the customer had a profile set for the home telephone number but was dialing into relay with a cell phone. A profile was established for the cell phone, and the customer was satisfied.
2/3/2010	Customer stated that profile is not appearing at the workstation.	2/3/2010	Customer Service verified that there was a profile for the customer on the old number but not the new number given. Customer Service updated the profile and a copy of the profile was e-mailed to the customer.
2/9/2010	Customer stated that the profile indicates slow typing, but the typing continues to cross the screen too quickly. Customer stated that this should be in profile but is not working properly.	2/9/2010	Assistant Operations Manager verified the customer's profile and discovered that the profile was set on the customer's previous telephone number. Profile was updated with the customer's number and customer was satisfied.
2/10/2010	Caller stated that an inmate is unable to place a call from the correctional facility using the	5/31/2010	Customer Service forwarded information to the technical department. The technical

	<p>relay. Caller sent an email with all possible ANIs. Caller requested a profile to be established to allow for local calls but bill collect for long distance.</p>		<p>department discovered that the line was identifying as a prison/inmate line, which requires collect billing for all call types. Profiles were set and customer notified. Customer will attempt test calls.</p>
2/11/2010	<p>Customer requested number for Purple Communications. Customer stated being unable to process a call from the prison facility to a local number.</p>	2/11/2010	<p>Customer Service provided the number requested. Customer Service apologized and stated that the relay is working with the inmate facility telephone administrator to implement profiles on the restricted lines. Customer Service provided the CA with billing instructions to process the customer's call. While instructing the CA, the customer disconnected.</p>
2/16/2010	<p>Customer stated that not all profile instructions are appearing at the workstation.</p>	2/16/2010	<p>Customer Service apologized and explained that relay had been attempting to contact the customer. Customer Service explained that not all of the customer's notes fit into the data space. Customer Service worked with the customer to consolidate notes.</p>
2/17/2010	<p>Customer stated that the service has been slower to connect and has noticed different language since the change in providers.</p>	2/18/2010	<p>PSC directed customer to Customer Service in regards to this issue. Customer Service contacted the customer and apologized for the issues experienced. Customer Service offered to set up a profile. No response received from the customer regarding the profile since contact.</p>
2/17/2010	<p>Customer stated that not all profile instructions are appearing at the workstation.</p>	2/17/2010	<p>Customer Service apologized and explained that relay had been attempting to contact the customer. Customer Service explained that not all of the customer's notes fit into the data space. Customer Service worked with the customer to consolidate notes.</p>
2/18/2010	<p>Customer stated the CA had poor spelling and did not type verbatim.</p>	2/20/2010	<p>Supervisor apologized and stated information would be forwarded to the technical department. The technical department was able to ascertain the CA in order to monitor the CA's performance.</p>
2/22/2010	<p>Customer stated that daughter attempted to contact her and attempted for several hours but</p>	2/24/2010	<p>Customer Service apologized and forwarded the information to the technical department. The</p>

	was never connected to a CA. Customer stated that she kept reaching the recording "All CA's are busy please remain on the line."		technical department discovered that the customer's number never reached the relay. Customer Service placed test calls successfully. Customer was satisfied.
2/28/2010	Customer stated not appreciating the timing of the PSA that came across the TV during the Winter Olympics. Customer would like to make the people aware of these announcements that this was done in poor respect and timing.	2/28/2010	Relay apologized that this occurred at this time. Relay assured the customer that Hamilton Relay does not provide the PSA's from the office but would forward the information and the customer's concern. Customer hung up.
3/2/2010	Customer stated when dialing client's number directly, the relay answers. Customer stated having this problem a couple of times.	3/2/2010	Supervisor explained that the number may have call forwarding activated. Supervisor suggested the customer attempt the call again or may need to contact the client in another manner. Customer understood.
3/3/2010	Customer stated having issues connecting to the relay. Customer reported long delays and receiving typing tones whenever calling his mother.	3/4/2010	Assistant Operations Manager apologized and verified that the profile was set correctly. Test calls were placed successful, but it was discovered that the mother needed additional training on VCO call etiquette. Customer understood.
4/9/2010	Customer stated being unable to place a call through the relay using 7-1-1 on a cellular phone.	4/9/2010	Customer Service apologized and forwarded the information to the technical department. The technical department discovered an issue with the radius for long distance calling. The radius was corrected and customer was notified. Customer was able to place call successfully.
4/19/2010	Customer stated being unable to reach relay when dialing 7-1-1 from a TTY.	4/19/2010	Customer Service offered troubleshooting tips to attempt with the TTY. Customer placed test calls after troubleshooting and the calls were successful. Customer was satisfied.
4/26/2010	Dialing/Set up – Call Waiting.	4/26/2010	Customer reported that call would not dial out successfully. Customer Service advised programming a comma into CapTel menu after call waiting block code. Confirmed that this resolved customer's experience.
5/3/2010	Customer requested Strata as long distance provider.	5/4/2010	Lead CA explained that Strata is not a participating provider through the relay. Lead CA

			<p>explained that a temporary profile would be set up to allow calls while the relay contacts Strata to become a participating provider through the relay. Customer Service was able to leave a message with the provider to become a participating provider. There has been no return call from the carrier. As of 5/31/10, Strata is still not a participating provider through the relay.</p>
5/21/2010	<p>Customer stated that when calling his parents through the relay, the CA dials the number and then there is no response. Customer stated that his parents call him back immediately. Customer inquired why his parents are not receiving anything from the CA.</p>	5/21/2010	<p>Supervisor attempted to gather information to forward to the technical department. Customer disconnected before call information could be gathered.</p>

**Attachment #1 (continued)**  
**Utah Public Service Commission – Complaint Log Summary**  
**June 1, 2009 – May 31, 2010**

**Sorenson Communications – VRS Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Explanation of Resolution</b>
6/10/08	Poor Video Interpreter (VI) quality.	6/10/08	No interpreter number provided with the complaint so no retraining could be completed.
6/25/08	VI receptive skills inadequate.	6/25/08	Customer Service: Responded to the customer.
7/07/08	Poor VI etiquette.	07/09/08	Manager: Interpreter retrained.
7/15/08	VI receptive skills inadequate.	7/15/08	Manager: Interpreter retrained.
9/04/08	VI receptive skills inadequate.	9/09/08	Manager: Interpreter retrained.
9/16/08	Poor VI etiquette.	9/18/08	Manager: Interpreter retrained.
9/22/08	Poor VI etiquette.	11/11/08	Manager: Interpreter retrained.
10/16/08	Poor VI etiquette.	11/11/08	Manager: Interpreter retrained.
10/31/08	VI signing/fingerspelling was unclear.	12/05/08	Manager: Interpreter retrained.
11/12/08	VI skills inadequate.	11/13/08	Manager: Interpreter retrained.
11/20/08	VI receptive skills inadequate.	11/20/08	Manager: Interpreter retrained.
12/01/08	Poor VI etiquette.	2/13/09	Manager: Interpreter retrained.
12/03/08	VI receptive skills inadequate.	12/3/08	Manager: Interpreter retrained.
12/16/08	Poor VI etiquette.	12/18/08	Manager: Interpreter retrained.
1/12/09	Poor VI quality.	2/05/09	Manager: Interpreter retrained.
1/13/09	Poor VI quality.	1/15/09	Wrong interpreter number.
1/16/09	Poor VI etiquette.	1/20/09	Manager: Interpreter retrained.
2/04/09	Poor VI etiquette.	2/04/09	Manager: Interpreter retrained.
2/07/09	Poor VI etiquette.	2/11/09	Manager: Interpreter retrained.
3/30/09	Poor VI etiquette.	3/31/09	Manager: Interpreter retrained.
4/08/09	VI receptive skills inadequate.	4/20/09	Manager: Interpreter retrained.
4/23/09	VI failed to relay conversation verbatim.	5/05/09	Manager: Interpreter retrained.
4/27/09	Poor VI etiquette.	4/29/09	Manager: Interpreter retrained.
5/07/09	Poor VI etiquette.	6/05/09	Director called and apologized to the customer.
5/11/09	VI receptive skills inadequate.	5/11/09	Manager: Interpreter retrained.

**Attachment #2**  
**Utah Public Service Commission – Summary of Complaints**  
**June 1, 2009 – May 31, 2010**

For the period of June 1, 2008 through May 31, 2009, there were a total of 34 (thirty-four) complaints filed with Sprint, Hamilton Relay, and Sorenson for Speech to Speech, VRS, and CapTel. No complaints were filed for any of the other services e.g. TRS, Spanish Relay, etc. From June 1, 2009 – January 27, 2010, Sprint received a total of 3 (three) customer complaints and all complaints were filed with supervisors at one of the Sprint TRS or Captioning centers. Hamilton Relay reports the receipt of 20 (twenty) complaints from January 28, 2010 – May 31, 2010. Sorenson Communications reports receiving a total of ## (#####) complaints for the entire year for all calls originating or terminating in the State of Utah. All ## (#####) complaints were resolved in a timely fashion, and none were escalated for action by the State of Utah or by the Federal Communications Commission.

**Attachment #3  
Utah Public Service Commission - Annual Tally Report**

**June 1, 2009 – January 27, 2010  
TRS/CapTel Customer Complaints  
Sprint**

<b>Type of Complaint</b>	<b>Number of Complaints</b>
Billing - General	1
Technical - General	3
Speech to Speech	1
Disconnect/Reconnect	1
Dialing 800 number	1
Consumer Education – USB	2

**Total = 3 complaints**

**January 28, 2010 – May 31, 2010  
TRS/CapTel Customer Complaints  
Hamilton Relay**

**June 1, 2009 – May 31, 2010  
VRS Customer Complaints**

<b>Type of Complaint</b>	<b>Number of complaints</b>
Video Interpreter (VI) Quality	3
VI Etiquette	12
VI signing/fingerspelling unclear	1
VI failed to relay conversation verbatim	1
VI receptive skills inadequate	8

**Total = 25 complaints**

**Attachment #3 (continued)**  
**Relay Utah - Annual Tally Report by Month**  
**June 1, 2009 - May 31, 2010**

<b>TRS/CapTel Tally</b>	<b>Number of Complaints</b>
June 2009	3
July 2009	0
August 2009	1
September 2009	1
October 2009	1
November 2009	0
December 2009	0
January 2010	1
February 2010	0
March 2010	2
April 2010	0
May 2010	0
<b>Total TRS/CapTel Complaints</b>	<b>9</b>

<b>VRS Tally</b>	<b>Number of Complaints</b>
June 2009	2
July 2009	2
August 2009	0
September 2009	3
October 2009	2
November 2009	2
December 2009	3
January 2010	3
February 2010	2
March 2010	1
April 2010	3
May 2010	2
<b>Total VRS Complaints</b>	<b>25</b>

**June 30, 2011**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-B204  
Washington, D.C. 20554

Re: TRS Consumer Complaints Log Summaries for the FCC, CG Docket 03-123

Dear Ms. Dortch:

In accordance with the Improved TRS Order issued in **CG Docket 03-123** by the Federal Communications Commission (FCC) and the order dated March 6, 2000, the Public Service Commission of Utah hereby submits the State of Utah's TRS Complaints Log. Included are summaries of reports Hamilton Relay and Sorenson Communications.

For the period of June 1, 2010 through May 31, 2011, the State of Utah submits the following complaints/commendations record. Hamilton Relay is Utah's TRS and CapTel provider and reports receiving 25 (twenty-five) complaints for TRS and 5 (five) complaints for CapTel, for a total of 30 (thirty) complaints. Sorenson VRS received 31 (thirty-one) customer complaints with 29 (twenty-nine) for VRS and 2 (two) for IP Relay. There were no complaints recorded for services such as Speech to Speech or Spanish Relay. Vendor complaint records add up to a total of 61 (sixty-one) complaints for the required time period. Any complaints received by the Commission Secretary and/or the TRS Specialist with the Utah Public Service Commission for all services were referred to the appropriate service provider and are included in their complaint records. All of the complaints were resolved in a timely fashion, and to the Utah PSC's knowledge, none of the aforementioned complaints escalated into action for the FCC.

The Commission continues to work with an advertising and public relations firm in order to assist with outreach efforts. Commercials, advertisements, and a continually updated website for Relay Utah services and the equipment distribution program keep the Public Service Commission staff busy. The advertising firm continues to assist with public service announcements for equipment and services such as the Captioned Telephone and mobile devices.

The Utah Public Service Commission continues to work in conjunction with the FCC and strives to be proactive towards providing the best possible relay service for the residents of the State of Utah.

Sincerely,

/s/ Julie Orchard  
Commission Secretary  
TRS Administrator  
160 East 300 South  
Salt Lake City, UT 84111  
(801) 530-6713 (V)  
(801) 530-6796 (fax)  
[jorchard@utah.gov](mailto:jorchard@utah.gov)

Attachment #1: Complaint Log Summary for Period of June 1, 2010 – May 31, 2011

Attachment #2: Summary of Complaints for Period of June 1, 2010 – May 31, 2011

Attachment #3: Annual Tally Report for Period of June 1, 2010 – May 31, 2011

cc: Arlene Alexander  
Federal Communications Commission  
Consumer & Governmental Affairs Bureau  
445 12<sup>th</sup> Street, S.W. Rm. 3-C408  
Washington, D.C. 20554

**Attachment #1**  
**Utah Public Service Commission - Complaint Log Summary**  
**June 1, 2010 – May 31, 2011**

**Hamilton - TRS Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Explanation of Resolution</b>
06/30/2010	External Complaints - Miscellaneous	06/30/2010	With State's permission, Hamilton contacted telephone administrator of an inmate facility and offered a profile to allow collect calling only to prevent voice to voice calls from being placed through the relay. <i>Profile was implemented and customer was satisfied.</i>
07/16/2010	Technical Complaints – Miscellaneous	07/20/2010	Customer stated that they have had difficulty when placing calls through the relay using CapTel device. <i>Customer Service forwarded information to the technical department. The technical department discovered that the calls processed correctly through the relay. Customer's information was forwarded to CapTel for a reset of the device. CapTel assisted the customer and investigated the calls through CapTel, which were processed correctly. Customer was notified and satisfied.</i>
07/26/2010	Service Complaints – Fraudulent/Harassment Call	07/26/2010	Customer has been receiving fraudulent phone calls through the relay. <i>Customer Service suggested that the customer contact their local telephone company and report the incident to law enforcement. Customer Service explained that if the customer contacts law enforcement then law enforcement may issue a court order. At that time the call information may be released to the Court. Customer understood.</i>
07/31/2010	Technical Complaints – Miscellaneous	08/03/2010	Customer stated that they requested a profile two months prior, but recently the CA's have stated that their profile information is not showing. <i>Lead CA forwarded information to the technical department. The technical department discovered that the profile was deleted and implemented again. Customer was notified.</i>
08/02/2010	Technical Complaints – 711 Problems	08/11/2010	Customer stated they were unable to reach 711. <i>Lead CA forwarded information to the technical department. The technical department was unable to locate the call. Test calls were placed to 711 which were</i>

			<i>successful. Customer Service explained that 711 was operating properly and that the technical department was unable to locate their call. Customer understood.</i>
08/05/2010	Technical Complaints – Miscellaneous	08/06/2010	<i>Customer stated that they have been unable to process a collect call through the relay. Customer stated that they were in the middle of call with the TTY party and then the CA came on the line and stated the call could not be processed, and it was disconnected. Customer Service forwarded information to the technical department. The technical department could not locate the call through the relay. Customer Service notified the customer.</i>
09/02/2010	Service Complaints – Fraudulent/Harassment Call	09/02/2010	<i>Customer has been receiving fraudulent phone calls through the relay. Supervisor suggested that the customer contact their local telephone company and report the incident to law enforcement. Supervisor explained that if the customer contacts law enforcement then law enforcement may issue a court order. At that time the call information may be released to the Court. Customer understood.</i>
09/08/2010	Technical Complaints – Miscellaneous	09/10/2010	<i>Customer stated that whenever they dial 711, they are connected TTY instead of voice. Customer Service verified the profile information was set correctly to voice. The technical department discovered that the CA changed connect mode. CA was counseled and customer was notified.</i>
09/25/2010	External Complaints - Miscellaneous	09/27/2010	<i>Customer stated every time he dials his brother's number, the call is answered by the relay. Customer stated that neither party uses the relay service. Supervisor apologized and attempted to gather additional information. Customer disconnected.</i>
12/08/2010	External Complaints - Miscellaneous	12/08/2010	<i>Customer stated that when dialing their mother's telephone number the relay answers. Customer Service explained that possibly their mother's telephone had call forwarding and that it may be forwarded to the relay. Customer Service directed the customer to their mother's telephone company for instructions to deactivate call forwarding. Customer stated that after deactivating call forwarding, they do not reach the relay. Customer was satisfied.</i>
12/13/2010	Service Complaints – Fraudulent/Harassment Call	12/13/2010	<i>Customer has been receiving fraudulent phone calls through the relay. Supervisor suggested that the customer contact their local telephone company and report the incident to law enforcement. Supervisor explained that if the customer</i>

			<i>contacts law enforcement then law enforcement may issue a court order. At that time call information may be released to the Court. Customer understood.</i>
01/06/2011	Service Complaints – Fraudulent/Harassment Call	01/06/2011	Customer has been receiving fraudulent phone calls through the relay. <i>Supervisor suggested that the customer contact their local telephone company and report the incident to law enforcement. Supervisor explained that if the customer contacts law enforcement then law enforcement may issue a court order. At that time call information may be released to the Court. Customer understood.</i>
01/11/2011	Technical Complaints – 711 Problems	02/15/2011	Customer has been unable to reach 711 on their T-Mobile cell phone. <i>Customer Service apologized and provided the toll-free number to reach the relay. Customer was satisfied. Customer Service has contacted T-Mobile and the issue was resolved.</i>
01/14/2011	External Complaints - Miscellaneous	01/14/2011	Customer stated that the hearing impaired inmates are unable to place a call from the facility. <i>Customer Service verified that the relay did not have a profile set on their inmate lines. Customer Service offered to place test calls and work with their telephone administrator. Customer refused at this time and stated they would call back if necessary. Customer was satisfied.</i>
01/31/2011	Technical Complaints – Carrier Choice Not Available/Other Equal Access	01/31/2011	Customer requested Centra Com as their long distance provider through the relay. <i>Supervisor explained that Centra Com is not a participating provider through the relay. Supervisor offered a temporary profile to allow calls, which was implemented. Centra Com was contacted to become a participating provider through the relay. There has been no further contact from Centra Com at this time. As of 5/31/2011, Centra Com is still not a participating provider through the relay.</i>
02/13/2011	External Complaints – Miscellaneous	02/14/2011	Customer stated they were unable to place a long distance call from their cell phone. <i>Lead CA apologized and forwarded information to the technical department. Profile was updated and customer was satisfied.</i>
02/18/2011	External Complaints – Miscellaneous	04/21/2011	Customer from an inmate calling service stated that they believe calls are being placed through the relay Voice to Voice. <i>were set and customer was notified Customer Service explained the relay and the Speech to Speech service. Customer Service offered to set up profiles for the customer in regards to this issue. Customer is forwarding a list of</i>

			<i>telephone numbers to profile. Profiles.</i>
03/09/2011	Service Complaints – Miscellaneous	03/09/2011	Customer stated they were attempting to place a call to a person’s TTY and CA transferred the call to customer service. <i>Customer Service placed a test call to the TTY number and discovered the voice announcer feature was on. Customer Service apologized and requested the customer attempt their call again through the relay. Customer was satisfied.</i>
03/09/2011	External Complaints – Miscellaneous	03/09/2011	Customer stated they were awaiting a representative from the state equipment distribution program to install their equipment and they had not shown at the appointed time. <i>Customer Service Manager apologized and provided the telephone number for the state equipment distribution program. Customer was satisfied.</i>
03/15/2011	External Complaints – Miscellaneous	03/15/2011	Customer stated they were awaiting a representative from the state equipment distribution program to install their equipment and they had not shown at the appointed time. <i>Supervisor apologized and provided the telephone number for the state equipment distribution program. Customer was satisfied.</i>
03/24/2011	External Complaints – Miscellaneous	03/24/2011	Customer stated they were awaiting a representative from the state equipment distribution program to install their equipment and they had not shown at the appointed time. <i>Customer Service apologized and provided the telephone number for the state equipment distribution program. Customer was satisfied.</i>
03/31/2011	Technical Complaints – 711 Problems	03/31/2011	Customer stated they have been unable to reach 711 from their cell phone. <i>Lead CA provided the toll-free number to reach the relay and attempted to gather customer information and cell phone provider information. Customer hung up.</i>
04/11/2011	Technical Complaints - Miscellaneous	04/20/2011	Customer stated she received a collect call from a deaf friend that lives five blocks away. <i>Customer Service Manager apologized and stated information would be forwarded to the technical department. The technical department discovered an issue with the NPX for the area. Issue was resolved and customer was notified.</i>
04/15/2011	Service Complaints – Fraudulent/Harassment Call	04/18/2011	Customer has been receiving fraudulent phone calls through the relay. <i>Customer Service Manager suggested that the customer contact their local telephone company and report the incident to law enforcement. Customer Service Manager explained that if the customer contacts law</i>

			<i>enforcement then law enforcement may issue a court order. At that time the call information may be released to the Court. Customer understood.</i>
04/17/2011	Technical Complaints – Miscellaneous	04/17/2011	Customer stated that whenever they place a call there is garbling during the call and they cannot complete the call. <i>Lead CA attempted to gather information, but customer disconnected.</i>

**Attachment #1**  
**Utah Public Service Commission - Complaint Log Summary**  
**June 1, 2010 – May 31, 2011**

**Hamilton Relay - CapTel Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Resolution of Complaint</b>
12/20/2011	Customer reported being unable to make calls successfully the afternoon of 12/20/10	12/21/2011	Customer Service Representative (CSR) apologized for this experience and noted there was a technical difficulty at the Call Center causing calls to be placed in queue and experience unusually long wait times during a five hour interval. An external equipment vendor corrected the matter. CSR confirmed the customer is now able to make their captioned call successfully without delay.
12/20/2011	Customer's friend reported that customer could not place a captioned call.	12/21/2011	CSR apologized for this experience and noted there was a technical difficulty at the Call Center causing calls to be placed in queue and experience unusually long wait times during a five hour interval. An external equipment vendor corrected the matter. CSR confirmed the customer is now able to make their captioned call successfully without delay.
02/02/2011	Customer's husband noted customer's inability to dial out with captions and receiving "CapTel Service is Ringing".	02/02/2011	CSR advised customer's husband that on 2/2/11 CapTel's staffing was affected by blizzard conditions. CSR apologized for the inconvenience this caused and advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under a state of emergency and civil danger warning. Both centers remained open and fielded calls nonstop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. CSR confirmed with customer they are able to make and receive calls in a timely manner.
02/02/2011	Customer's son indicated that captions are not coming in on 2-line mode.	02/02/2011	CSR advised customer's son that CapTel's staffing was affected by blizzard conditions. CSR apologized for the inconvenience this caused and

			advised staying on the line for the next available captionist. Center locations in Madison and Milwaukee were under a state of emergency and civil danger warning. Both centers remained open and fielded calls non-stop. Service levels were not met for the day due to delayed answer time. The state of emergency ended on 2/2/11. Staffing capacity was restored. CSR confirmed with customer they are able to make and receive calls in a timely manner.
02/09/2011	Caller stated that cannot get caller ID on CapTel but can on standard telephone.	02/09/2011	Customer Service advised caller to update software on the CapTel in order to get caller ID on the phone.

**Attachment #1 (continued)**  
**Utah Public Service Commission – Complaint Log Summary**  
**June 1, 2010 – May 31, 2011**

**Sorenson Communications – VRS Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Explanation of Resolution</b>
06/22/10	VI skills inadequate	06/24/10	Manager: Interpreter retrained.
06/02/10	VI disconnected caller	06/09/10	Manager: Interpreter retrained.
06/29/10	VI receptive skills inadequate	06/30/10	Manager: Interpreter retrained.
07/07/10	Poor VI etiquette	07/12/10	Manager: Interpreter retrained.
07/07/10	VI did not follow caller's request	07/08/10	Wrong ID: Interpreter did not work that day or no longer works for Sorenson.
07/09/10	VI did not keep caller informed	07/09/10	Manager: Interpreter retrained.
07/13/10	SignMail – poor quality	07/13/10	No interpreter number provided with complaint.
08/02/10	Poor video quality	08/03/10	Customer Service: Apologized to the customer for the technical issue.
08/18/10	SignMail – poor quality	08/23/10	Manager: Interpreter retrained.
08/20/10	VI failed to keep caller informed	08/20/10	Customer Service: Responded to the caller.
09/08/10	Poor VI etiquette	09/08/10	Manager: Interpreter retrained.
09/21/10	VI skills inadequate	09/23/10	Manager: Interpreter retrained.
10/14/10	Poor VI etiquette.	10/19/10	Manager: Interpreter retrained.
10/28/10	Poor VI etiquette	11/01/10	Manager: Interpreter retrained.
11/08/10	Confidentiality concerns	01/10/11	Manager: Interpreter retrained.
11/18/10	VI receptive skills inadequate.	11/22/10	Director called and apologized to the customer.
12/08/10	VI receptive skills inadequate.	12/14/10	Customer Service: Responded to the customer.
12/08/10	SignMail – poor quality	12/08/10	Manager: Interpreter retrained.
12/10/10	VI signing was not clear	12/10/10	Manager: Interpreter retrained.
02/11/11	Poor VI etiquette	02/15/11	Manager: Interpreter retrained.
02/17/11	VI disconnected caller	02/24/11	Manager: Interpreter retrained.
02/17/11	VI failed to relay conversation verbatim	02/18/11	Manager: Interpreter retrained.
03/02/11	Poor VI etiquette	03/03/11	Manager: Interpreter retrained.
03/23/11	VI dress inappropriate	03/25/11	Manager: Interpreter retrained.
03/25/11	Poor VI etiquette	03/28/11	Manager: Interpreter retrained.
03/28/11	Poor VI etiquette	04/04/11	Manager: Interpreter retrained.
04/15/11	Poor VI etiquette	04/25/11	Manager: Interpreter retrained.
04/27/11	Poor VI etiquette	04/29/11	Manager: Interpreter retrained.
05/11/11	Poor VI etiquette	05/16/11	Manager: Interpreter retrained.

**Attachment #1 (continued)**  
**Utah Public Service Commission – Complaint Log Summary**  
**June 1, 2010 – May 31, 2011**

**Sorenson Communications – Internet Protocol Relay Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date of Resolution</b>	<b>Explanation of Resolution</b>
10/04/2010	CA etiquette	10/05/2010	Manager: CA retrained.
02/11/2011	Unable to connect to service	02/11/2010	Customer Service: Responded to customer.

**Attachment #2**  
**Utah Public Service Commission – Summary of Complaints**  
**June 1, 2010 – May 31, 2011**

For the period of June 1, 2010 through May 31, 2011, there were a total of 61 complaints (sixty-one) complaints filed with Hamilton Relay and Sorenson for TRS, VRS, IP Relay, and CapTel. No complaints were filed for any of the other services e.g. Spanish Relay, Speech to Speech, etc. From June 1, 2010 – May 31, 2011, Hamilton received a total of 30 (thirty) customer complaints and all complaints were filed with supervisors at one of the Hamilton TRS or Captioning centers. Sorenson Communications reports receiving a total of 31 (thirty-one) complaints for the entire year for all calls originating or terminating in the State of Utah for Video Relay Service (29) and IP Relay (2). All 61 (sixty-one) complaints were resolved in a timely fashion, and none were escalated for action by the State of Utah or by the Federal Communications Commission.

**Attachment #3**  
**Utah Public Service Commission - Annual Tally Report**  
**June 1, 2010 – May 31, 2011**

**CapTel Customer Complaints**  
**Hamilton Relay**

<b>Type of Complaint</b>	<b>Number of Complaints</b>
Caller ID	1
Technical - General	2
Service – General	2

**Total = 5 complaints**

**TRS Customer Complaints**  
**Hamilton Relay**

<b>Type of Complaint</b>	<b>Number of Complaints</b>
External Complaints – Miscellaneous	9
Service Complaints – Fraudulent/Harassment Call	6
Technical Complaints – 711 problems	3
Technical Complaints – Carrier of Choice Not Available/Other Equal Access	1
Technical Complaints – Miscellaneous	6

**Total = 25 complaints**

**Attachment #3 - continued**  
**Utah Public Service Commission - Annual Tally Report**  
**June 1, 2010 – May 31, 2011**

**VRS Customer Complaints**  
**Sorenson Communications**

<b>Type of Complaint</b>	<b>Number of complaints</b>
Video Interpreter (VI) Quality	3
VI Etiquette	11
VI disconnected caller	2
VI did not follow caller's request	1
VI failed to keep caller informed	2
SignMail – poor quality	3
VI dress inappropriate	1
VI failed to relay conversation verbatim	1
VI receptive skills inadequate	5

**Total = 29 complaints**

**IP Relay Customer Complaints**  
**Sorenson Communications**

<b>Type of Complaint</b>	<b>Number of complaints</b>
Unable to connect to service	1
CA Etiquette	1

**Total = 2 complaints**

**Attachment #3 (continued)**  
**Relay Utah - Annual Tally Report by Month**  
**June 1, 2010 - May 31, 2011**

<b>TRS/CapTel Tally</b>	<b>Number of Complaints</b>
June 2010	1
July 2010	3
August 2010	2
September 2010	3
October 2010	0
November 2010	0
December 2010	4
January 2011	4
February 2011	5
March 2011	5
April 2011	3
May 2011	0
<b>Total TRS/CapTel Complaints</b>	<b>30</b>

<b>VRS/IP Relay Tally</b>	<b>Number of Complaints</b>
June 2010	3
July 2010	4
August 2010	3
September 2010	2
October 2010	3
November 2010	2
December 2010	3
January 2011	0
February 2011	4
March 2011	4
April 2011	2
May 2011	1
<b>Total VRS Complaints</b>	<b>31</b>



State of Utah

GARY R. HERBERT  
Governor

GREG BELL  
Lieutenant Governor

## Public Service Commission

TED BOYER  
*Chairman*

RIC CAMPBELL  
*Commissioner*

RON ALLEN  
*Commissioner*

**June 26, 2012**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-B204  
Washington, D.C. 20554

Re: TRS Consumer Complaints Log Summaries for the FCC, CG Docket 03-123

Dear Ms. Dortch:

In accordance with the Improved TRS Order issued in **CG Docket 03-123** by the Federal Communications Commission (FCC) and the order dated March 6, 2000, the Public Service Commission of Utah hereby submits the State of Utah's TRS Complaints Log. Included are summaries of reports Hamilton Relay and Sorenson Communications.

For the period of June 1, 2011 through May 31, 2012, the State of Utah submits the following complaints/commendations record. Hamilton Relay is Utah's TRS and CapTel provider and reports receiving 13 (thirteen) complaints for TRS and 0 (zero) complaints for CapTel, for a total of 13 (thirteen) complaints. There were also no complaints recorded for services such as Speech to Speech or Spanish Relay. Sorenson VRS received 24 (twenty-four) customer complaints VRS and 0 (zero) for IP Relay as well as 0 (zero) for Caption Calls. Vendor complaint records add up to a total of 37 (thirty-seven) complaints for the required time period. Any complaints received by the Commission Secretary and/or the TRS Specialist with the Utah Public Service Commission for all services were referred to the appropriate service provider and are included in their complaint records. All of the complaints were resolved in a timely fashion, and to the Utah PSC's knowledge, none of the aforementioned complaints escalated into action for the FCC.

The Commission continues to work with an advertising and public relations firm in order to assist with outreach efforts. Commercials, advertisements, and a continually updated website for Relay Utah services and the equipment distribution program keep the Public Service Commission staff busy. The advertising firm continues to assist with public service announcements for equipment and services such as the Captioned Telephone and mobile devices.

The Utah Public Service Commission continues to work in conjunction with the FCC and strives to be proactive towards providing the best possible relay service for the residents of the State of Utah.

Sincerely,

/s/ Gary Widerburg  
Commission Secretary  
TRS Administrator  
160 East 300 South  
Salt Lake City, UT 84111  
(801) 530-6713 (V)  
(801) 530-6796 (fax)  
[gwiderburg@utah.gov](mailto:gwiderburg@utah.gov)

Attachment #1: Complaint Log Summary for Period of June 1, 2011 – May 31, 2012

Attachment #2: Summary of Complaints for Period of June 1, 2011 – May 31, 2012

Attachment #3: Annual Tally Report for Period of June 1, 2011 – May 31, 2012

cc: Arlene Alexander  
Federal Communications Commission  
Consumer & Governmental Affairs Bureau  
445 12<sup>th</sup> Street, S.W. Rm. 3-C408  
Washington, D.C. 20554

**Attachment #1**  
**Utah Public Service Commission - Complaint Log Summary**  
**June 1, 2011 – May 31, 2012**

**Hamilton - TRS Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Explanation of Resolution</b>
06/30/2011	Technical Complaints - 711 Problems	06/30/2011	Customer stated that their deaf neighbor is unable to dial 711. <i>Customer Service Manager attempted to gather contact information, but customer refused to provide it. Customer Service Manager provided the correct toll-free number to access the relay. Customer was satisfied.</i>
06/30/2011	Technical Complaints - 711 Problems	06/30/2011	Customer stated whenever they dial 711, they do not reach Relay Utah. <i>Supervisor attempted to gather information, but customer disconnected.</i>
08/05/2011	External Complaints - Miscellaneous	08/05/2011	Customer stated that they are unable to place a call through the relay to a specific number. <i>Customer Service discovered that the number was not in service. Customer understood.</i>
08/30/2011	Technical Complaints - 711 Problems	08/30/2011	Customer stated that they are unable to dial 711 from the office. <i>Customer Service explained the toll-free translation and provided the number. Customer Service offered to speak with the telephone administrator, but the customer refused.</i>
09/12/2011	Technical Complaints – 711 Problems	09/12/2011	Customer stated whenever they dial 711, they reach Georgia Relay. <i>Supervisor discovered that the customer was using a cell phone. Supervisor provided the toll-free number for Relay Utah. Customer was satisfied.</i>
09/27/2011	Service Complaints – Fraudulent/Harassment Call	09/27/2011	Customer has been receiving harassing telephone calls through the relay. <i>Supervisor suggested that the customer contact their local telephone company or report the incident to law enforcement. Supervisor explained that if the customer contacts law enforcement then a court order may be issued. At that time call information may be released to the Court. Customer understood.</i>

10/24/2011	Technical Complaints - 711 Problems	10/24/2011	Customer states that every time they dial 711, they reach Relay Utah and not the relay for their state. <i>Supervisor provided the toll-free number for their state relay. Customer Service contacted the customer's provider with the correct toll-free number for translation. Issue was resolved and customer was satisfied.</i>
11/01/2011	Service Complaints - Miscellaneous	11/01/2011	Customer stated several issues with Hamilton Relay and their policy and procedures. <i>Relay Utah Outreach Coordinator apologized and stated their concerns would be forwarded to management. Customer Service Manager continue to work with customer to resolve issues. Customer understood.</i>
02/14/2012	Technical Complaints - 711 Problems	02/14/2012	Customer was using their cell phone in a different state and reached Relay Utah when calling 711. <i>Supervisor provided the toll free number for the state relay. Customer Service contacted the customer's provider with the correct toll-free number for translation. Issue was resolved and customer was satisfied.</i>
02/29/2012	Service Complaints - Fraudulent/Harassment Call	02/29/2012	Customer has been receiving harassing phone calls through the relay. <i>Customer Service suggested that the customer contact their local telephone company or report the incident to law enforcement. Customer Service explained that if the customer contacts law enforcement then a court order could be issued. At that time call information may be released to the Court. Customer understood.</i>
03/15/2012	Service Complaints – Fraudulent/Harassment Call	03/15/2012	Officer stated they were investigating fraudulent calls and requested documentation explaining what information was needed for a subpoena. <i>Supervisor forwarded information to management. Customer Service Manager forwarded the requested letter. Customer was satisfied.</i>
03/23/2012	Service Complaints – Fraudulent/Harassment Call	03/23/2012	Officer stated they were investigating fraudulent calls and requested documentation explaining what information was needed for a subpoena. <i>Supervisor forwarded information to the Customer Service Manager. Customer Service Manager forwarded the requested letter. Customer was satisfied..</i>

04/27/2012	Service Complaints – Fraudulent/Harassment Call	04/27/2012	Customer has been receiving harassing telephone calls through the relay. <i>Customer Service suggested that the customer contact their local telephone company or report the incident to law enforcement. Customer Service explained that if the customer contacts law enforcement then a court order may be issued. At that time call information may be released to the Court. Customer understood.</i>
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**Attachment #1**  
**Utah Public Service Commission - Complaint Log Summary**  
**June 1, 2011 – May 31, 2012**

**Hamilton Relay - CapTel Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Resolution of Complaint</b>
NA	There were no complaints in violation of FCC standards for Utah CapTel from June 1, 2011 - May 31, 2012.	NA	NA

**Utah Public Service Commission – Complaint Log Summary**  
**June 1, 2011 – May 31, 2012**

**Sorenson Communications – Internet Protocol Relay Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date of Resolution</b>	<b>Explanation of Resolution</b>
NA	There were no complaints in violation of FCC standards from June, 2011 to May, 2012.	NA	NA

**Attachment #1 (continued)**  
**Utah Public Service Commission – Complaint Log Summary**  
**June 1, 2011 – May 31, 2012**

**Sorenson Communications – VRS Complaints**

<b>Date of Complaint</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Explanation of Resolution</b>
06/02/11	VI etiquette	06/06/11	Management: Interpreter/operator have been retrained.
06/09/11	VI etiquette	06/09/11	Management: Interpreter/operator have been retrained.
06/09/11	VI failed to relay conversation verbatim	06/09/11	Management: Interpreter/operator have been retrained.
07/20/11	SignMail - poor video quality	07/28/11	Management: Interpreter/operator have been retrained.
07/28/11	VI failed to relay recording verbatim	08/03/11	Management: Interpreter/operator have been retrained.
08/17/11	VI receptive skills inadequate	08/24/11	Customer Service: Apologized to customer.
08/28/11	Poor video quality	08/28/11	Forwarded to the appropriate people.
08/28/11	VI failed to relay conversation verbatim	08/29/11	Management: Interpreter/operator have been retrained.
09/08/11	VI etiquette	09/12/11	Management: Interpreter/operator have been retrained.
09/15/11	SignMail - poor video quality	09/18/11	Management: Interpreter/operator have been retrained.
11/18/11	VI etiquette	11/21/11	Management: Interpreter/operator have been retrained.
12/15/11	VI failed to relay recording verbatim.	12/21/11	Management: Interpreter/operator have been retrained.
12/27/11	VI failed to relay conversation verbatim.	01/05/12	Management: Interpreter/operator have been retrained.
12/27/11	Poor video quality	12/27/11	Customer Service: Apologized to the customer for the technical issue.
12/29/11	VI etiquette	01/03/12	Forwarded to the appropriate people.
01/05/12	VI receptive skills inadequate	01/18/12	Management: Interpreter/operator have been retrained.
01/11/12	VI skills inadequate.	01/13/12	Management: Interpreter/operator have been retrained.
02/13/12	VI failed to relay recording verbatim	02/13/12	No Interpreter/Operator ID number provided with the complaint
03/02/12	VI skills inadequate	03/02/12	Escalated to Management: Resolution
03/02/12	VI did not keep caller informed	03/06/12	Management: Interpreter/operator have been retrained.
03/26/12	VI receptive skills inadequate	03/27/12	Management: Interpreter/operator have been retrained.

05/08/12	VI did not follow caller's request	05/14/12	Management: Interpreter/operator have been retrained.
05/22/12	VI etiquette	05/22/12	Management: Interpreter/operator have been retrained.
05/24/12	VI receptive skills inadequate	05/24/12	Management: Interpreter/operator have been retrained.

**Attachment #2**  
**Utah Public Service Commission – Summary of Complaints**  
**June 1, 2011 – May 31, 2012**

For the period of June 1, 2011 through May 31, 2012, there were a total of 37 complaints (thirty-seven) complaints filed with Hamilton Relay for TRS and Sorenson for VRS. No complaints were filed for any of the other services e.g. IP Relay, CapTel, Caption Calls, Spanish Relay, Speech to Speech, etc. From June 1, 2011 – May 31, 2012, Hamilton received a total of 13 (thirteen) customer complaints for TRS and all complaints were filed with supervisors at one of the Hamilton centers. Sorenson Communications reports receiving a total of 24 (twenty-four) complaints for the entire year identified as originating in the State of Utah for Video Relay Service. All 37 (thirty-seven) complaints were resolved in a timely fashion, and none were escalated for action by the State of Utah or by the Federal Communications Commission.

**Attachment #3**  
**Utah Public Service Commission - Annual Tally Report**  
**June 1, 2011 – May 31, 2012**

**TRS Customer Complaints**  
**Hamilton Relay**

<b>Type of Complaint</b>	<b>Number of Complaints</b>
Service - Fraudulent/Harassment Call	5
Technical - 711 Problems	6
External - Miscellaneous	1
Service – Miscellaneous	1

**Total = 13 complaints**

**CapTel Customer Complaints**  
**Hamilton Relay**

<b>Type of Complaint</b>	<b>Number of Complaints</b>
There were no complaints in violation of FCC standards from June, 2011 to May, 2012.	0

**Total = 0 complaints**

**Attachment #3 - continued**  
**Utah Public Service Commission - Annual Tally Report**  
**June 1, 2011 – May 31, 2012**

**VRS Customer Complaints**  
**Sorenson Communications**

<b>Type of Complaint</b>	<b>Number of complaints</b>
VI failed to relay recording verbatim	3
VI Etiquette	6
VI did not follow caller's request	1
VI failed to keep caller informed	1
SignMail – poor quality	2
Poor video quality	2
VI failed to relay conversation verbatim	3
VI receptive skills inadequate	6

**Total = 24 complaints**

**IP Relay Customer Complaints**  
**Sorenson Communications**

<b>Type of Complaint</b>	<b>Number of complaints</b>
There were no complaints in violation of FCC standards from June, 2011 to May, 2012.	0

**Total = 0 complaints**

**Attachment #3 (continued)**  
**Relay Utah - Annual Tally Report by Month**  
**June 1, 2011 - May 31, 2012**

<b>TRS Tally</b>	<b>Number of Complaints</b>
June 2011	2
July 2011	0
August 2011	2
September 2011	2
October 2011	1
November 2011	1
December 2011	0
January 2012	0
February 2012	2
March 2012	2
April 2012	1
May 2012	0
<b>Total TRS Complaints</b>	<b>13</b>

<b>VRS Tally</b>	<b>Number of Complaints</b>
June 2010	3
July 2010	2
August 2010	3
September 2010	2
October 2010	0
November 2010	1
December 2010	4
January 2011	2
February 2011	1
March 2011	3
April 2011	0
May 2011	3
<b>Total VRS Complaints</b>	<b>24</b>